

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF ILLINOIS  
3  
4 BRITTANI DANETTE ATKINS, )  
5 Plaintiff, )  
6 -vs- ) No. 1:21-cv-02408  
7 HEALTHCARE REVENUE RECOVERY )  
8 GROUP, L.L.C., )  
9  
10 Defendant. )

The videoconference deposition of BRITTANI ATKINS, taken remotely before JUNE M. FUNKHOUSER, CSR, RMR, and Notary Public, pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, commencing at 9:54 a.m. on December 14, 2021.

24 Job No. CS4984831

<p>1 There were present via videoconference at 2 the taking of this deposition the following 3 counsel: 4 MR. PAUL CAMARENA 5 500 South Clinton, No. 132 6 Chicago, Illinois 60607 7 312.493.7494 8 paulcamarena@paulcamarena.com 9 on behalf of the Plaintiff; 10 GORDON &amp; REES LLP by 11 MS. KRISTA EASOM 12 One North Franklin, Suite 800 13 Chicago, Illinois 60606 14 312.980.6766   312.565.6511 (fax) 15 keasom@grsm.com 16 17 on behalf of the Defendant. 18 19 20 21 22 23 24</p>	<p>Page 2</p> <p>1 (Whereupon the witness was 2 duly sworn.) 3 MS. EASOM: Hi, Brittani. So as Paul 4 just said, my name is Krista. I work for a law 5 firm named Gordon &amp; Rees, and we represent 6 Healthcare Revenue Recovery Group, the defendant in 7 this case. 8 Just before we get started, Paul, 9 should we just stipulate on the record that 10 everybody consents to taking the deposition 11 remotely and waives any objections in which the 12 manner the deposition is being taken? 13 MR. CAMARENA: Yes, we can stipulate to 14 that. 15 MS. EASOM: Okay; great. 16 So let the record reflect that this is 17 the deposition of Brittani Atkins. The deposition 18 is proceeding pursuant to notice. The deposition 19 will proceed in accordance with the Federal Rules 20 of Civil Procedure, the Federal Rules of Evidence, 21 and the local rules for the Northern District of 22 Illinois. 23 24</p>
<p>1 I N D E X 2 Witness: Page 3 BRITTANI ATKINS 4 Direct Examination by Ms. Easom 5 5 6 E X H I B I T S 7 EXHIBIT 1 19 8 Notice of Deposition of Plaintiff 9 Brittani Danette Atkins 10 EXHIBIT 2 26 11 United Healthcare Bill 12 Bates HRRG005 13 EXHIBIT 3 26 14 Letter, 1/14/20 15 Bates HRRG003 - HRRG005 16 EXHIBIT 4 35 17 Phone Record 18 EXHIBIT 5 40 19 Complaint in Case 1:21-cv-02408 20 EXHIBIT 6 61 21 Plaintiff's Rule 26(a)(1) Disclosures 22 EXHIBIT 7 75 23 Complaint in Case 1:21-cv-01484 24 EXHIBIT 8 76 25 Plaintiff's Responses to Defendant 26 HRRG's First Set of Interrogatories 27 to Plaintiff 28 EXHIBIT 9 86 29 Plaintiff's Responses to Defendant 30 HRRG's Request for Admissions 31 32 NOTE: Exhibits were provided for inclusion with 33 deposition transcripts.</p>	<p>Page 3</p> <p>1 BRITTANI ATKINS 2 witness herein, called for examination, having been 3 first duly sworn, was examined and testified as 4 follows: 5 DIRECT EXAMINATION 6 BY MS. EASOM: 7 Q Ms. Atkins, it's a pleasure to meet you. 8 If at any point in time if you can't hear me or, 9 you know, you feel like the connection is breaking 10 up, will you just go ahead and interject and let us 11 know? 12 A Sure. 13 Q Great. Thank you. 14 So during this deposition I'm going to 15 ask you questions, and unless your attorney, you 16 know, tells you not to answer, you may hear him 17 object, but you're still going to answer the 18 question unless he specifically tells you not to 19 answer. 20 And when you do answer I ask that you 21 clearly, you know, give a yes or no answer. 22 Because we're in a deposition, if you nod your head 23 yes or no and do certain things like that like you 24 would in an in-person or in a conversation, it's</p>

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<p>1 going to be hard for June to kind of capture those  2 answers since she's creating the record here today.  3 So if you could just be cognizant of that, that  4 will save us a little bit of time with having to  5 reask questions or confirm whether your answer was  6 yes or no.</p> <p>7 Does that make sense?</p> <p>8 A Yes.</p> <p>9 Q What was that? I'm sorry?</p> <p>10 A Yes, it makes sense.</p> <p>11 Q Okay. Now, have you ever appeared in a  12 deposition before?</p> <p>13 A No.</p> <p>14 Q Okay. Have you ever been a witness at a  15 trial or anything like that?</p> <p>16 A No.</p> <p>17 Q Okay. So if you ever need a break, just  18 let me know. You know, it's totally fine if you  19 have to go to the bathroom or make a phone call,  20 just let us know and we can go ahead and take a  21 five-minute break, but I ask that you kind of think  22 of this as similar to how you would act in a  23 deposition in person. So, you know, I'd ask that  24 you don't text during the deposition and, you know,</p>	<p>1 A No.</p> <p>2 Q And I forgot to ask, do you mind just  3 spelling your name for me, your full name just to  4 make sure we have it correctly?</p> <p>5 A Brittni, B-r-i-t-t-a-n-i, Atkins,  6 A-t-k-i-n-s.</p> <p>7 Q Great. And do you have a middle name?</p> <p>8 A Danette, D-a-n-e-t-t-e.</p> <p>9 Q Okay. Thank you.</p> <p>10 Have you ever gone by any other names?</p> <p>11 A No.</p> <p>12 Q And is that your maiden name or have you  13 ever been married before and taken another name?</p> <p>14 A No, that's my maiden name. Never  15 married.</p> <p>16 Q Okay. And do you live with anybody at  17 your apartment at 9525 South Troy?</p> <p>18 A My mother lives here. She's not here  19 right now.</p> <p>20 Q Okay. And what's your mother's name?</p> <p>21 A And my son. My son lives here, but he's  22 at school.</p> <p>23 Q Okay.</p> <p>24 A My mother is Sharon Atkins.</p>
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<p>1 you don't surf the internet or do things like that  2 that you wouldn't normally do in an in-person  3 deposition.</p> <p>4 And, like I said, if you need to take  5 a break for any reason to handle something, just  6 let us know and we can hit the pause button and  7 take a five-minute break.</p> <p>8 A Okay.</p> <p>9 Q So where are you right now?</p> <p>10 A Right now I'm at home.</p> <p>11 Q You're at home? Okay.</p> <p>12 A Uh-huh.</p> <p>13 Q And where is that?</p> <p>14 A 9524 South Troy Avenue, Apartment 1S,  15 Evergreen Park, Illinois, 60805.</p> <p>16 Q Okay; great.</p> <p>17 And is anybody else in the room with  18 you right now?</p> <p>19 A No.</p> <p>20 Q And is anybody else in the house with you  21 right now or in your apartment?</p> <p>22 A No.</p> <p>23 Q Okay. Do you expect anybody to come  24 home, you know, during the deposition?</p>	<p>1 Q Sharon Atkins, okay.</p> <p>2 A Uh-huh.</p> <p>3 Q And your son's name?</p> <p>4 A Payton, P-a-y-t-o-n, Harris.</p> <p>5 Q Harris, H-a-r-r-i-s?</p> <p>6 A Correct.</p> <p>7 Q Thank you.</p> <p>8 And how old is Payton?</p> <p>9 A Payton is 12.</p> <p>10 Q 12, okay. And how old are you?</p> <p>11 A I'm 36.</p> <p>12 Q 36, okay. So have you been living in  13 Chicago your whole life or what states have you  14 lived in?</p> <p>15 A Yes, I've lived in Chicago my whole life.</p> <p>16 I lived in Chicago, in Evergreen Park.</p> <p>17 Q Okay, in Evergreen Park. So you never  18 moved to Texas or anything like that? I did a  19 quick search of your name and Houston, Texas,  20 popped up. Was that maybe another Brittni Atkins  21 or did you live in Texas for a while?</p> <p>22 A No, no, no, no. I am transitioning to  23 Texas. I have two places in Chicago. I have a  24 place on 88th and Marshfield in Chicago that I own,</p>

<p style="text-align: right;">Page 10</p> <p>1 and I have another building here, 9524 Troy, and  2 now I'm acquiring another place in Texas, yes. I  3 have real estate, but right now my primary address  4 and my mailing address should be listed at.  5 9524 South Troy Avenue, yes.</p> <p>6 Q Got it. And you said you own that  7 apartment now?</p> <p>8 A I do not own that apartment. I own the  9 space on 88th and Marshfield.</p> <p>10 Q Okay.</p> <p>11 A I'm looking into acquiring that apartment  12 on 9524 Troy. We've been in talks about it because  13 I've been there for a little bit now. And then  14 there's a townhouse in Texas, Pearland, not  15 Houston, Pearland, Texas, that I am acquiring right  16 now.</p> <p>17 Q Awesome. And the address at 88th and  18 Marshfield, is that in Chicago?</p> <p>19 A Yes, 8844 South Marshfield Avenue. I own  20 that one.</p> <p>21 Q And do you rent it out or do family  22 members live there?</p> <p>23 A Yeah, I have -- I had a tenant in there  24 now, they've moved out, and now I'm going to</p>	<p style="text-align: right;">Page 12</p> <p>1 A I did.</p> <p>2 Q Okay. And where did you go to high  3 school?</p> <p>4 A Kenwood Academy in Chicago.</p> <p>5 Q And when did you graduate?</p> <p>6 A 2003.</p> <p>7 Q Now after college -- we're just going to  8 go over your employment history a little bit just  9 so we can get a feel of your background a little  10 bit more. After you graduated college in 2007 what  11 was your first job?</p> <p>12 A My first job was Southwest Airlines.</p> <p>13 Q What was your position?</p> <p>14 A Customer service.</p> <p>15 Q And how long were you at Southwest?</p> <p>16 A 13 years.</p> <p>17 Q 13 years, okay. Customer service, so  18 that brings us to --</p> <p>19 A Today. Last year. Last year. I left  20 Southwest last year.</p> <p>21 Q 2020.</p> <p>22 A Yeah.</p> <p>23 Q Do you remember about what month you left  24 Southwest?</p>
<p style="text-align: right;">Page 11</p> <p>1 acquire a new tenant.</p> <p>2 Q Okay. And then the address in Texas, do  3 you have a specific address or are you shopping  4 around for a home?</p> <p>5 A I'm shopping around right now. I do have  6 a specific address in mind, but that wouldn't be  7 relevant right now I don't think.</p> <p>8 Q We're going to go over your education,  9 work experience. Could you let us know what's your  10 highest level of education?</p> <p>11 A I have a bachelor's of science degree.</p> <p>12 Q Okay. And where did you get that?</p> <p>13 A Lewis University.</p> <p>14 Q Lewis. And where is that located?</p> <p>15 A Romeoville, Illinois.</p> <p>16 Q And what was your bachelor's degree in,  17 is it a specific major like political science or  18 something like that?</p> <p>19 A Forensic criminal investigations.</p> <p>20 Q Criminal investigations, okay. And when  21 did you graduate?</p> <p>22 A May of 2007.</p> <p>23 Q And then before that did you attend  24 college right after high school?</p>	<p style="text-align: right;">Page 13</p> <p>1 A August.</p> <p>2 Q August 2020.</p> <p>3 A Uh-huh.</p> <p>4 Q And did you -- did you travel to  5 Southwest -- I mean, did your job require any  6 travel or did you go to a Southwest location to,  7 you know, attend work here in Chicago? Or did you  8 work remotely?</p> <p>9 A Yeah, I worked in Chicago. I traveled as  10 a trainer here and there but that would be Dallas,  11 Texas, but primarily my station was Chicago-Midway  12 Airport.</p> <p>13 Q Chicago-Midway, okay. And did you need  14 to get any sort of professional certificates or  15 training at all after you graduated college or, you  16 know, during your employment at Southwest did you  17 get any sort of trainings or certificates or  18 anything like that?</p> <p>19 A As it relates to Southwest or in general?</p> <p>20 Q Both. You know, did you have any sort of  21 side jobs that you did or side businesses that you  22 started during your time at Southwest?</p> <p>23 A Yeah. Actually, I have several  24 certifications from Southwest, one being Six Sigma</p>

<p>1 training. I have an insurance license. So I'm  2 very capable of selling insurance, which is what  3 I'm doing now, and yeah.</p> <p>4 Q So did you leave Southwest to start the  5 insurance -- to pursue your insurance business?</p> <p>6 A It was started before I left. I left  7 because early retirement was offered to us during  8 the pandemic. Obviously I've been there for quite  9 some time, so I decided my time was up.</p> <p>10 Q Okay. Something popped up, Atkins  11 Financial Solutions, LLC. Is that a business that  12 you started?</p> <p>13 A Yes, that is me.</p> <p>14 Q Okay. And what kind of business is that?</p> <p>15 A It's financial consulting basically for  16 individuals and different businesses also.</p> <p>17 Q And when did you start that business?</p> <p>18 A We started that business in 2019. 2019.</p> <p>19 Q And is that your main source of income  20 now?</p> <p>21 A Yeah. Yeah, yeah.</p> <p>22 Q Going back to the insurance certificates,  23 the insurance license you have, is there a  24 particular area that you specialize in? What's</p>	<p>Page 14</p> <p>1 for that location, yeah.</p> <p>2 Q Okay. Now, what -- do you have two  3 separate cell phones for your personal use and for  4 your business?</p> <p>5 A I do.</p> <p>6 Q Okay. And what is your personal cell  7 phone number?</p> <p>8 A 773 [REDACTED]</p> <p>9 Q Okay. And is that the same telephone  10 number that you received calls from Healthcare  11 Revenue Recovery Group?</p> <p>12 A That is the phone number, yes, the 773  13 number.</p> <p>14 Q Okay. And what make -- what make and  15 model is your cell phone that you have right now,  16 your personal cell phone?</p> <p>17 A It's a Samsung Galaxy Note.</p> <p>18 Q Okay. And is that the same cell phone  19 you had when you received the calls from Healthcare  20 Revenue Recovery Group?</p> <p>21 A That's correct.</p> <p>22 Q Okay. And what cell phone carrier do you  23 use, like Verizon, T-Mobile, Sprint?</p> <p>24 A T-Mobile.</p>
<p>1 the --</p> <p>2 A Life.</p> <p>3 Q Oh, go ahead.</p> <p>4 A Life insurance.</p> <p>5 Q Life insurance. And are you affiliated  6 with any sort of insurance company?</p> <p>7 A Right now I am affiliated with FFL, which  8 is Family First Life Insurance Company.</p> <p>9 Q Okay. Going back to Atkins Financial,  10 LLC, do you have a website for that business?</p> <p>11 A I do not.</p> <p>12 Q Okay. And do you have a separate phone  13 number for that business?</p> <p>14 A I do.</p> <p>15 Q Okay. And what is that phone number?</p> <p>16 A 312/610-2220.</p> <p>17 Q And do you have a separate e-mail address  18 for that business?</p> <p>19 A I do.</p> <p>20 Q And what is that?</p> <p>21 A batkins@atkinsfinancial.org.</p> <p>22 Q And do you have a brick-and-mortar  23 location for that business?</p> <p>24 A I do not. I have a -- a virtual office</p>	<p>Page 15</p> <p>Page 17</p> <p>1 Q T-Mobile. And do you use that cell phone  2 carrier for both your business and your personal  3 phone?</p> <p>4 A That is correct.</p> <p>5 Q Have you had any other creditors appear  6 on your credit report besides Healthcare Revenue  7 Recovery Group?</p> <p>8 A Yes, there was a few.</p> <p>9 Q And can you name those other creditors  10 that were on your credit report?</p> <p>11 A Oh, I would have to pull my credit  12 report. No, I don't know right offhand.</p> <p>13 Q Okay. If you had to guess, I mean, how  14 many different creditors were listed on there? Do  15 you have like a number in mind? Was it two, five?</p> <p>16 A Maybe three or four, maybe, at some  17 particular point.</p> <p>18 Now when you say listed on my credit  19 report, positive things are also listed on your  20 credit report, as you may know, so are you meaning  21 negative creditors or creditors in general?</p> <p>22 Q Outstanding creditors similar to the  23 outstanding balance that Healthcare Revenue  24 Recovery Group --</p>

<p>1 A Okay. So, no, not three or four. I 2 apologize for that. Probably one or two. A 3 couple.</p> <p>4 Q Okay.</p> <p>5 A I don't make it a habit of having 6 creditors call me all the time.</p> <p>7 Q Yeah. Was Capital One Bank one of them 8 potentially?</p> <p>9 A Capital One Bank. Could have been a 10 while ago. Was that 2000 and something, yeah? 11 More than seven years ago?</p> <p>12 Q I'm not sure. I don't have the date 13 right here, but if it --</p> <p>14 A Yeah, that's way irrelevant. That was 15 way more than seven years ago. That was fresh out 16 of college, so that is not in question right now. 17 That was long, long ago.</p> <p>18 Q Have you ever filed for bankruptcy?</p> <p>19 A I have, yes.</p> <p>20 Q Okay. And is it -- was it in 2013 and 21 2017?</p> <p>22 A Yes. The 2017 one we didn't really 23 finish that, so I don't know if that really counts. 24 But, yes, in 2013 I did do a bankruptcy.</p>	<p>Page 18</p> <p>1 BY MS. EASOM:</p> <p>2 Q So I'm going to pull up -- I'm going to 3 share my screen with you for a second here and just 4 pull up what we're going to mark as Exhibit 1.</p> <p>5 Can you let me know what you see on 6 your screen?</p> <p>7 A In the United States District Court for 8 the Northern District of Illinois, Eastern 9 Division, Brittani Danette versus Healthcare 10 Revenue Recovery Group, notice of deposition.</p> <p>11 Q Okay. Is there anything else that you 12 see on the screen or just that one document?</p> <p>13 A Just that one document.</p> <p>14 Q So have you ever seen this before, the 15 notice of deposition, before today?</p> <p>16 A No. Not that I know of.</p> <p>17 Q Okay. This is just a notice that we sent 18 to your attorney, Paul, you know, indicating that 19 your deposition is today and at 10:00 a.m.</p> <p>20 A Yeah, he told me about it.</p> <p>21 Q Okay.</p> <p>22 THE WITNESS: Did you send this to me, 23 Paul?</p> <p>24 MR. CAMARENA: No, I didn't send it to</p>
<p>Page 19</p> <p>1 Q Okay. And, you know, I actually forgot to 2 ask in the beginning of the deposition, do you have 3 any papers or documents in front of you right now?</p> <p>4 A No. Just a little notes pad.</p> <p>5 Q Notepad?</p> <p>6 A Uh-huh.</p> <p>7 Q Okay. Could you just let us know if you 8 pull up any documents during the deposition?</p> <p>9 A Yeah, sure. I don't have anything but 10 that in case I need to write anything down.</p> <p>11 Q Okay. And did you review any documents 12 in preparation of the deposition today?</p> <p>13 A No. I don't have any documents to 14 review. I just understood that I was here to 15 answer some questions.</p> <p>16 Q And your driver's license now, is that a 17 Texas driver's license or an Illinois driver's 18 license?</p> <p>19 A My driver's license right now is a Texas 20 driver's license.</p> <p>21 Q Texas, okay.</p> <p>22 A Yes.</p> <p>23 (Document was marked Exhibit 1 24 for identification.)</p>	<p>Page 21</p> <p>1 you. We just talked about it, which is fine.</p> <p>2 THE WITNESS: Oh, okay. I'm like should 3 I have it?</p> <p>4 BY MS. EASOM:</p> <p>5 Q No, no. That's fine.</p> <p>6 A Okay.</p> <p>7 Q I'm just trying to, you know, get a feel 8 for, you know, what you've seen --</p> <p>9 A Yeah. I was making sure like did I miss 10 an e-mail or something. I didn't know if I should 11 have this or not.</p> <p>12 Q Oh, no. It's quite all right.</p> <p>13 You know, before the deposition, you 14 know, we sent this to your attorney and, you know, 15 we included this Exhibit A, this deposition rider, 16 so I'm assuming that you haven't seen this either 17 asking you to bring, you know, documents to the 18 deposition?</p> <p>19 A Oh. No.</p> <p>20 Q Okay.</p> <p>21 A What should I have brought to this?</p> <p>22 Q No, no. You don't have to worry about --</p> <p>23 A Oh.</p> <p>24 Q Yeah. I just am trying to find out if</p>

<p style="text-align: right;">Page 22</p> <p>1 you've seen this before. That's all.</p> <p>2 A Okay.</p> <p>3 Q But no problem. We'll keep it moving.</p> <p>4 So I kind of just want to get an</p> <p>5 understanding of the kind of timeline of events</p> <p>6 starting with the medical services you received</p> <p>7 back in 2019. So do you remember visiting Little</p> <p>8 Company of Mary in September of 2019?</p> <p>9 A It's possible. I'm sure if they said I</p> <p>10 was there in September I was probably there in</p> <p>11 September. It's very possible. I've been diabetic</p> <p>12 since I was ten, so hospital visits are not new for</p> <p>13 me.</p> <p>14 Q Okay.</p> <p>15 A But I'm sure it happened, yeah.</p> <p>16 Q So you visited healthcare professionals</p> <p>17 frequently over the years, over the last five, ten</p> <p>18 years?</p> <p>19 A Oh, yeah. Absolutely.</p> <p>20 Q Do you mind just kind of giving me a</p> <p>21 rundown of any diagnoses that you've received over</p> <p>22 the years? You know, you mentioned that you've</p> <p>23 been diabetic for several years. How long have you</p> <p>24 been diabetic?</p>	<p style="text-align: right;">Page 24</p> <p>1 A I do not remember receiving a bill.</p> <p>2 Q Okay. Do you think you did receive</p> <p>3 something in the mail?</p> <p>4 A It's possible. I don't remember</p> <p>5 receiving a bill from Little Company of Mary, no.</p> <p>6 Q Okay. I'm going to share my screen with</p> <p>7 you one more time.</p> <p>8 A Okay.</p> <p>9 Q Can you see this document right here?</p> <p>10 Can you let me know what you see at the top of the</p> <p>11 page?</p> <p>12 A United Healthcare Insurance Company,</p> <p>13 9900 Bren Road.</p> <p>14 Q Okay; great.</p> <p>15 Is this something that you've seen</p> <p>16 before or does this refresh your recollection in</p> <p>17 terms of what you may have received after that</p> <p>18 hospital visit in September of 2019?</p> <p>19 A It does not.</p> <p>20 Q Okay. And do you see this line right</p> <p>21 here where it says PT RESP 27.57?</p> <p>22 A I do.</p> <p>23 Q So that right there, is that the same</p> <p>24 amount that Healthcare Revenue Recovery Group was</p>
<p style="text-align: right;">Page 23</p> <p>1 A 26 years.</p> <p>2 Q Okay. And do you have any other</p> <p>3 diagnoses that you treat for?</p> <p>4 A No, that's it. Type 1 diabetes.</p> <p>5 Q Okay. And your visit in September of</p> <p>6 2019, do you -- you can't recall, you know, why you</p> <p>7 went to Little Company of Mary?</p> <p>8 A 2019. Yeah, I'm sure it was for</p> <p>9 hyperglycemia. I'm pretty sure that was the day</p> <p>10 when I left work. My pump which I wear, insulin</p> <p>11 pump, was not functioning properly. I think my</p> <p>12 sugar was like over 600 or something, and I believe</p> <p>13 that was the day in question back in 2019.</p> <p>14 Q Okay. And you were working at Southwest</p> <p>15 during that time, right?</p> <p>16 A That's correct. Uh-huh.</p> <p>17 Q And did you have health insurance through</p> <p>18 Southwest?</p> <p>19 A I did.</p> <p>20 Q Do you remember what that health</p> <p>21 insurance was?</p> <p>22 A United Healthcare.</p> <p>23 Q Now do you remember receiving a bill</p> <p>24 after your visit in September of 2019?</p>	<p style="text-align: right;">Page 25</p> <p>1 calling you about?</p> <p>2 A I am assuming that is the same amount.</p> <p>3 Yes, at this day they said something similar. I</p> <p>4 don't know if they exactly said 27.57. I remember</p> <p>5 something closer to 30, but it's possible that they</p> <p>6 said 27.57.</p> <p>7 Q Okay. Did you pay Healthcare Revenue</p> <p>8 Recovery Group any money?</p> <p>9 A I did not.</p> <p>10 Q Okay. And did you pay Inpatient</p> <p>11 Consultants of Illinois this 27.57 at any point?</p> <p>12 A I did not.</p> <p>13 Q Okay. I'm going to stop sharing my</p> <p>14 screen.</p> <p>15 So what was the first time you</p> <p>16 remember hearing from Healthcare Revenue Recovery</p> <p>17 Group?</p> <p>18 A I don't have an exact date for you guys</p> <p>19 that I remember exactly first hearing from them</p> <p>20 because I've been hearing from them for some time</p> <p>21 now, but I don't have that exact date available</p> <p>22 right now --</p> <p>23 Q Okay.</p> <p>24 A -- from my very, very first contact with</p>

<p>1 them, no.</p> <p>2 MS. EASOM: Okay. And, June, can you go</p> <p>3 ahead and mark that bill that I just shared on my</p> <p>4 screen as Exhibit 2?</p> <p>5 THE REPORTER: Sure.</p> <p>6 MS. EASOM: Thank you.</p> <p>7 (Documents were marked Exhibits</p> <p>8 2 and 3 for identification.)</p> <p>9 BY MS. EASOM:</p> <p>10 Q So I'm going to share my screen with you</p> <p>11 again, and we're going to mark this as Exhibit 3.</p> <p>12 Can you let me know what you see at the top of your</p> <p>13 screen?</p> <p>14 A HRRG, mail return only, P.O. Box 8486,</p> <p>15 Coral Springs, Florida.</p> <p>16 Q Okay. And is this your current address</p> <p>17 here, the 9524 South Troy Ave.?</p> <p>18 A That is my mailing address, yes.</p> <p>19 Q Okay. Do you remember receiving this</p> <p>20 letter dated January 14th, 2020?</p> <p>21 A I do not.</p> <p>22 Q Okay. So what is the first time you</p> <p>23 remember receiving contact from Healthcare Revenue</p> <p>24 Recovery Group? Was it a phone call?</p>	Page 26	<p>1 that conversation?</p> <p>2 A I do.</p> <p>3 Q Could you just kind of give us a summary</p> <p>4 of what was said during that conversation?</p> <p>5 A Sure. So I picked up my phone and it was</p> <p>6 a female voice on the other end. I said hello.</p> <p>7 She said hello. She said can she speak to me,</p> <p>8 Brittani Atkins. I said, "This is she." And she</p> <p>9 said, you know, "This is a debtor trying to collect</p> <p>10 a debt. Any information received will be used for</p> <p>11 that purposes. This call will be monitored and,</p> <p>12 you know, recorded for quality assurance purposes,"</p> <p>13 blah, blah, blah.</p> <p>14 So I'm like, "Okay, cool. Who is</p> <p>15 this?" And she's like, "Well, I need to, you know,</p> <p>16 get your information so that I can know that I'm</p> <p>17 talking to the right person."</p> <p>18 So I'm like, "Well, who are you?" And</p> <p>19 she said she's calling from HRRG. I said, "I don't</p> <p>20 have any business with HRRG." And she went on,</p> <p>21 "You have business. Oh, you have business with</p> <p>22 HRRG."</p> <p>23 I'm like, "What does HRRG even stand</p> <p>24 for? I'm 100 percent sure I don't have any</p>	Page 28
<p>1 A Yes.</p> <p>2 Q Okay.</p> <p>3 A It was a phone call.</p> <p>4 Q And do you remember around what time,</p> <p>5 and, I apologize, I may have already asked you this</p> <p>6 and I think you may have answered, but do you</p> <p>7 remember around what time off the top of your head,</p> <p>8 you know, that phone call was made?</p> <p>9 A I do not.</p> <p>10 Q Okay.</p> <p>11 A You mean the date, right? I don't</p> <p>12 remember the date.</p> <p>13 Q Okay. But it was in 2021?</p> <p>14 A Yes. It was probably 2020, actually.</p> <p>15 No, it was probably 2020 when I first started</p> <p>16 with -- hearing from them.</p> <p>17 Q Okay.</p> <p>18 A I'm almost certain. I'm almost certain</p> <p>19 it was before this year. I'm almost certain.</p> <p>20 Q And do you remember the first</p> <p>21 conversation you had with someone from Healthcare</p> <p>22 Revenue Recovery Group?</p> <p>23 A I do.</p> <p>24 Q And do you remember what was said during</p>	Page 27	<p>1 business with HRRG." And she's like, "Well, you</p> <p>2 know, just so I can know I'm talking to the right</p> <p>3 person can you" -- she started asking me all my</p> <p>4 personal information.</p> <p>5 I'm like, "I'm not going to give you</p> <p>6 my personal information because I don't even know</p> <p>7 you and I don't have any business with HRRG, like</p> <p>8 I'm not going to give you my address and my last</p> <p>9 four of my Social and all this other -- I don't</p> <p>10 know you. I don't have any business with HRRG." I</p> <p>11 was a hundred percent sure that I had never had</p> <p>12 business with HRRG.</p> <p>13 So she just kept saying, you know,</p> <p>14 "You have business, you have business," and I was</p> <p>15 just like, "No, I don't. You know, you can</p> <p>16 probably take me out of your database because I'm</p> <p>17 quite sure you have the wrong person."</p> <p>18 But come to find out I guess they did</p> <p>19 not, but at that time I knew I did not have any</p> <p>20 business with HRRG for sure.</p> <p>21 Q Do you remember -- when you say they were</p> <p>22 asking for your personal information, do you</p> <p>23 remember specifically what they asked you?</p> <p>24 A I know she asked me for like my full</p>	Page 29

<p style="text-align: right;">Page 30</p> <p>1 name, even though she should have my full name    2 because she called me, I didn't call her, and she    3 asked me for like my address. I can't remember if    4 she asked me for the last four of my Social, but I    5 know for sure she asked me like my address and my    6 full name for the record. I wasn't going to give    7 her my address because I didn't even -- it's so    8 easy for somebody to call you and get your    9 information. I'm like, "No."</p> <p>10 Q Have you ever received a telephone call    11 from a creditor before?</p> <p>12 A Yeah. I've received a call from a    13 creditor before.</p> <p>14 Q Okay. And when was that approximately?</p> <p>15 A Oh, I don't know. I don't write this    16 stuff down.</p> <p>17 Q And do you remember that first telephone    18 call that you received from Healthcare Revenue    19 Recovery Group, was that to your personal phone or    20 your business phone?</p> <p>21 A Yes, that was to my personal phone,    22 773/402-9322.</p> <p>23 Q Okay. And do you remember, you know,    24 what you saw when you received the call? Was it a</p>	<p>1 number.</p> <p>2 Q And is part of your business getting    3 referrals from friends and people will reach out to    4 you because they -- from word of mouth they've    5 heard about your financial --</p> <p>6 A Yeah, it's very possible. Yeah.</p> <p>7 Q Okay. And do you have a Facebook page    8 for your business as well?</p> <p>9 A I have a LinkedIn and a Twitter.</p> <p>10 Q What's your Twitter handle?</p> <p>11 A Breeyahdoesit.</p> <p>12 Q I'm sorry. What was that?</p> <p>13 A B-r-e-e-y-a-h doesit, d-o-e-s-i-t.</p> <p>14 Q Now, after Healthcare Revenue Recovery    15 Group called you that first time did you block    16 their number?</p> <p>17 A I did not. I told them that I had no    18 business with them. I didn't know they were going    19 to keep calling me over and over, so I had no real    20 reason to block them at that time. They're not    21 even blocked to this day.</p> <p>22 Q Did you ever send Healthcare Revenue    23 Recovery Group any letters?</p> <p>24 A I did not.</p>
<p style="text-align: right;">Page 31</p> <p>1 telephone number on your caller ID?</p> <p>2 A Yes, it was a telephone number in my    3 caller ID the first time. Well, every time.</p> <p>4 Q And when you receive phone calls from    5 numbers that aren't saved in your phone do you    6 typically answer those phone calls?</p> <p>7 A I do.</p> <p>8 Q Okay. Do you ever receive telephone    9 calls from out-of-state numbers?</p> <p>10 A I do.</p> <p>11 Q Okay. And do you typically answer those    12 phone calls as well?</p> <p>13 A Yes.</p> <p>14 Q Do you have people that you don't know    15 calling you because you have your Atkins Financial,    16 LLC, as part of your business?</p> <p>17 A Would they call my 773 phone number?</p> <p>18 It's possible depending on who the reference was or    19 if they got my information on Facebook or a group    20 or something like that. It's possible. It's not    21 my listed number as the business number, but if    22 it's a reference of a reference of a friend or    23 something and they have my personal number it's    24 very possible that someone could call me on that</p>	<p style="text-align: right;">Page 33</p> <p>1 Q Did you ever send them any e-mails?</p> <p>2 A No.</p> <p>3 Q And did you ever call Healthcare Revenue    4 Recovery Group?</p> <p>5 A I called them, yes. I called them once.</p> <p>6 Q Okay. And was that -- I just want to    7 make sure we're kind of going in chronological    8 order. After that first conversation when was the    9 next time that you spoke with Healthcare Revenue    10 Recovery Group over the phone?</p> <p>11 A The next time I spoke with them over the    12 phone I believe was April.</p> <p>13 Q And that was when you called them or did    14 they call you?</p> <p>15 A That was when they called me and hung up,    16 and then I called them back.</p> <p>17 Q Okay. Now when you answered the phone    18 what did you hear on the other end on that second    19 telephone conversation?</p> <p>20 A Silence.</p> <p>21 Q Okay.</p> <p>22 A And I'm saying, "Hello. Hello." And    23 then I heard like -- like bye, hang-up.</p> <p>24 Q And do you remember where you were when</p>

<p>1 you received that phone call?</p> <p>2 A Yeah, I was at home.</p> <p>3 Q Okay. Has that ever happened to you</p> <p>4 before where you answer the phone and you don't</p> <p>5 hear anything on the other end?</p> <p>6 A No, not often.</p> <p>7 Q But it has happened before?</p> <p>8 A I'm typically connected to the -- not at</p> <p>9 home, no. I'm typically connected to the WiFi at</p> <p>10 home. I don't have those issues at home. Now</p> <p>11 maybe if I'm like driving in a remote area or</p> <p>12 something then it's possible, but at home, no, I</p> <p>13 don't have those issues. I have Xfinity WiFi.</p> <p>14 They're really great.</p> <p>15 Q When -- excuse me. Strike that.</p> <p>16 How did you know that it was</p> <p>17 Healthcare Revenue Recovery Group who called you?</p> <p>18 A Because I called them back.</p> <p>19 Q Okay.</p> <p>20 A I called them back on the exact same</p> <p>21 number, and that's when I was like, "Hi, who is</p> <p>22 this? Who is this that just hung up on me?" And</p> <p>23 she's like, "Oh, this is HRRG." I'm like, "Okay.</p> <p>24 So why did you hang up on me?"</p>	Page 34	<p>1 the phone after you answered?</p> <p>2 A That's correct.</p> <p>3 Q Okay. And this second phone call here on</p> <p>4 this screenshot, is this the telephone call where</p> <p>5 you called Healthcare Revenue Recovery Group back?</p> <p>6 A That's correct.</p> <p>7 Q Okay. Now when you called them back,</p> <p>8 what did they say?</p> <p>9 A I asked who it was, and she said she was</p> <p>10 from HRRG and she needed my information to make</p> <p>11 sure that she was talking to the right person and</p> <p>12 all this.</p> <p>13 At this point I gave her the</p> <p>14 information. I'm like, hey, if this is somebody</p> <p>15 trying to scam me they're doing -- they're really</p> <p>16 consistent and persistent, so let me just give it</p> <p>17 to them. If it's a scammer then I'll deal with it.</p> <p>18 I'll contact, you know, Experian and all those</p> <p>19 people if they're trying to like steal my identity</p> <p>20 or something.</p> <p>21 So I gave her the information and I</p> <p>22 was like, you know, "Who do you work for because</p> <p>23 I'm still 100 percent sure that I have no business</p> <p>24 with HRRG." And then she's like, "Well, we're</p>	Page 36
<p>1 Then we had a conversation for four</p> <p>2 minutes. I'm sure you have that information.</p> <p>3 MR. CAMARENA: I sent that to you.</p> <p>4 MS. EASOM: Yeah. Yeah, why don't we</p> <p>5 pull that up.</p> <p>6 BY MS. EASOM:</p> <p>7 Q Can you let me know what you see right</p> <p>8 now?</p> <p>9 A It's my phone record. It says incoming</p> <p>10 4/27/2021 and outgoing 4/27/2021.</p> <p>11 MS. EASOM: June, can we go ahead and are</p> <p>12 we on Exhibit 4 now?</p> <p>13 THE REPORTER: Yes.</p> <p>14 MS. EASOM: Okay; great.</p> <p>15 (Document was marked Exhibit 4</p> <p>16 for identification.)</p> <p>17 BY MS. EASOM:</p> <p>18 Q So this screenshot right here, does this</p> <p>19 show the telephone calls that you were just</p> <p>20 describing?</p> <p>21 A Yes. That's them.</p> <p>22 Q So this first call here at the top that</p> <p>23 says incoming, one minute, is this the telephone</p> <p>24 call that Healthcare Revenue Recovery Group hung up</p>	Page 35	<p>1 calling on behalf of Little Company of Mary."</p> <p>2 Okay. She never said that to me</p> <p>3 before. All they just keep calling and leaving</p> <p>4 these weird voice messages, "We're HRRG, give us a</p> <p>5 call back." So I just ignored those because it's</p> <p>6 like I don't have any business with you guys,</p> <p>7 please stop calling here. So I didn't even pay</p> <p>8 that any attention, but at this point I'm like,</p> <p>9 "Okay, who is this," just so I could really get you</p> <p>10 guys to really, really listen to me and stop</p> <p>11 calling here.</p> <p>12 So she's like she's calling on behalf</p> <p>13 of Little Company of Mary Hospital. I'm like,</p> <p>14 "Okay. What about Little Company of Mary</p> <p>15 Hospital?" Then she goes to say that I have an</p> <p>16 outstanding balance. "What's the balance because</p> <p>17 it must be \$1 million the way you guys are calling</p> <p>18 me."</p> <p>19 So she's like, oh, I remember her</p> <p>20 saying \$37, but apparently she must have said \$27.</p> <p>21 I could be wrong. It's what I remember. So she</p> <p>22 said \$37, something weird. I'm like \$37. First of</p> <p>23 all, I didn't even know I owed Little Company of</p> <p>24 Mary \$37. Second of all, I definitely did not know</p>	Page 37

<p style="text-align: right;">Page 38</p> <p>1 it warranted this amount of process to collect \$37.    2 I would have then paid the \$37 just to keep them    3 off my butt, like please stop calling here    4 multiple, multiple times, I told you guys I don't    5 have business with you, and to this day I still    6 don't have business with them. Little Company of    7 Mary sold that debt to them if that's the case, but    8 I still to this day do not have business with HRRG    9 at all. I never signed anything with HRRG. I    10 don't have any business with HRRG. It is not --    11 that's between them and Little Company of Mary. I    12 don't have anything to do with this at this point.    13 Q Did you ever contact --    14 A I never had an agreement with HRRG ever.    15 I've never had an agreement with HRRG.    16 Q Did you ever contact Little Company of    17 Mary about the outstanding balance Healthcare    18 Revenue Recovery Group communicated to you?    19 A No. No. I didn't.    20 Q Okay. Now this telephone number on this    21 screenshot, is this the telephone number that you    22 received the call from that showed up on your    23 phone?    24 A That's correct. That is correct.</p>	<p style="text-align: right;">Page 40</p> <p>1 any friends or family members after the telephone    2 conversation with Healthcare Revenue Recovery    3 Group?    4 A I did not.    5 Q Okay. Was that April call that we just    6 were talking about, was that the last time you    7 heard from Healthcare Revenue Recovery Group?    8 A Yeah, I believe it was. I want to say --    9 I want to say that that was the last.    10 Q And it's fine if you don't remember    11 certain things.    12 A Yeah, I believe so. I believe after that    13 I think that was the last.    14 MS. EASOM: I'm going to share another    15 exhibit with you.    16 June, do you mind marking this as    17 Exhibit 5? Is that what we're on now?    18 THE REPORTER: Yes.    19 MS. EASOM: Okay; great.    20 (Document was marked Exhibit 5    21 for identification.)    22 BY MS. EASOM:    23 Q So, Ms. Atkins, can you let me know what    24 you see on your screen?</p>
<p style="text-align: right;">Page 39</p> <p>1 Q And do you recall if this is the same    2 phone number that you received the phone call from    3 the first conversation with Healthcare Revenue    4 Recovery Group?    5 A I do not recall if that's the first    6 number that I've ever, ever received from them, but    7 I do remember it being the same zip -- area code.    8 It could have been another 249 number, I could pull    9 those records if you need them, but I'm -- it looks    10 similar to the same number.    11 Q Do you know what area code this is for,    12 what state this area code is for?    13 A It looks local. I know Illinois is --    14 has a couple different area codes now. I believe    15 872 is an Illinois area code now. But anything    16 that's not like 800, 866, or anything like that I'm    17 going to typically answer the phone.    18 Q So what happened after those phone calls    19 with Healthcare Revenue Recovery Group? Did you    20 have anybody around you when you were speaking with    21 Healthcare Revenue Recovery Group, any friends or    22 family members who overheard the conversation?    23 A No.    24 Q And did you, you know, communicate with</p>	<p style="text-align: right;">Page 41</p> <p>1 A In the U.S. District Court for the    2 Northern District of Illinois, Eastern Division,    3 Brittani Danette Atkins, plaintiff, versus    4 Healthcare Revenue Recovery Group, defendant,    5 complaint, introduction, et cetera.    6 Q So do you recognize this to be the    7 complaint that Mr. Camarena filed against    8 Healthcare Revenue Recovery Group after those    9 telephone calls?    10 A I'm sure this is it. I only see the    11 front page of it so...    12 I'm sure that this is the document.    13 Q Do you remember whether you reviewed the    14 complaint before Mr. Camarena filed it?    15 A Yeah, I reviewed -- he wrote it up for    16 me. I did review it. I looked at it and we    17 went -- we moved on with this complaint.    18 Q So do you believe everything in this    19 complaint is true and accurate?    20 A Yes, I am believing that everything in    21 the complaint is true and accurate.    22 Q Okay. And what is your understanding of    23 what Healthcare Revenue Recovery Group does?    24 A They collect debts on behalf of their</p>

<p style="text-align: right;">Page 42</p> <p>1 clients, Little Company of Mary being one of them, 2 I'm assuming. 3 Q And when was the first time you heard of 4 Healthcare Revenue Recovery Group? 5 A The first time the lady called me. 6 Q Okay. So we're just going to go through 7 your complaint a little bit here just to make sure, 8 you know, we have a good understanding of what your 9 allegations are and everything that happened. 10 So starting with this first -- I'm 11 sorry, this first paragraph -- or third paragraph 12 here it says Ms. Brittani Atkins is a resident of 13 the Eastern Division. The Eastern Division is in 14 Chicago, Illinois, so you are still -- are you 15 still a resident of Illinois? 16 A Yes, I'm still currently a resident of 17 Illinois. I was a resident of Illinois when this 18 whole thing started. Like you stated in the 19 beginning, I do have a Texas license. I am 20 relocating to Texas. I have a couple of different, 21 you know, addresses, but right now as I'm speaking 22 with you I am at 9524 South Troy, Evergreen Park, 23 Illinois. 24 Q In this fourth paragraph here it says:</p>	<p style="text-align: right;">Page 44</p> <p>1 frame in which we're speaking of? 2 Q Well, let me ask the question a different 3 way. I mean, this paragraph 5 says here that 4 you've incurred consumer debts and you struggled to 5 service all of them. What is the -- what is that 6 referencing to? What consumer debts is this 7 paragraph referencing to? 8 A Again, I've had some debt. I tried to 9 clear up all the debt when I'm, you know, aware of 10 it. I was not aware of this debt that was \$30. 11 That would have been the first thing on my list to 12 pay, \$30, but like higher debt, like couple of 13 credit cards that I had. You mentioned Capital 14 One. That was long ago, though. But if you do 15 have the bankruptcy in your possession, which you 16 looked at it, so that sort of thing. 17 The student loans is like \$80,000 18 right now and, you know, all of that that's listed 19 in that one bankruptcy that you apparently looked 20 at earlier is the debt that I'm referring to. The 21 mortgage on 88th and Marshfield, it's like 22 expensive. It's just a lot. It's a lot of things. 23 But this \$30 debt, yeah. 24 Q Okay.</p>
<p style="text-align: right;">Page 43</p> <p>1 Healthcare Revenue Recovery Group, LLC, is a debt 2 collector as that term is defined in the Act, at 3 15 USC Section 1692a(6); and the defendant is also 4 a limited liability company authorized to transact 5 business in Illinois. 6 Do you believe that to be true? 7 A Yeah, I believe that to be true. 8 Q After you received the phone call from 9 Healthcare Revenue Recovery Group did you ever do 10 any investigation, like any Googling, to get more 11 information about the company? 12 A No. 13 Q Okay. Does this paragraph here mention 14 that you incurred a significant -- Ms. Atkins has 15 incurred significant consumer debts and she has 16 struggled to service all of her consumer debts, and 17 she eventually became delinquent with respect to 18 some consumer debts, including a consumer debt for 19 less than \$30 to Little Company of Mary Hospital. 20 Can you give us a little bit more 21 information about what other debts that you became 22 delinquent on during that time frame? 23 A This time frame or what time frame are we 24 talking? April or 2020 or which? What's the time</p>	<p style="text-align: right;">Page 45</p> <p>1 A So there's some things that are 2 delinquent but this -- this should not have been 3 one of them again. 4 Q And do you remember what other credit 5 cards besides maybe the Capital One card that maybe 6 you missed some payments on? 7 A None. I don't know everything right 8 offhand. 9 Q What -- how many credit cards do you have 10 right now? 11 A Right now I don't have any credit cards. 12 I have closed out my credit cards right now. I 13 only have like Shell gas card, but I don't have any 14 credit cards. I've closed out all of my credit 15 cards, and I don't need any credit cards right now. 16 It's a bad habit to have. 17 Q So this paragraph 7, if we could just 18 talk about this for a minute, it states here: Upon 19 information and belief, Defendant Healthcare 20 Revenue Recovery places telephone calls only from 21 the East Coast. 22 Can you explain that a little bit 23 more? 24 A Yeah, because from my understanding</p>

<p>1 they're in Florida or something, right?</p> <p>2 Q So you believe that Healthcare Revenue</p> <p>3 Recovery Group is based in Florida?</p> <p>4 A Yeah.</p> <p>5 Q Okay. And what's the -- why do you think</p> <p>6 that?</p> <p>7 A That's where they're based, right?</p> <p>8 Q I'm sorry. I can't answer any questions.</p> <p>9 A Oh, I'm sorry.</p> <p>10 Q I'm sorry. And it's okay if you don't</p> <p>11 know, you know, the answer. I'm just trying to get</p> <p>12 a little bit more information about what you know</p> <p>13 about HRRG or Healthcare Revenue Recovery Group.</p> <p>14 A Right. Yeah. I believe that they're in</p> <p>15 Florida, and that's why I believe that they would</p> <p>16 be calling from Florida because they're in Florida.</p> <p>17 I don't exactly remember how I know that they're in</p> <p>18 Florida, but they're in Florida. I'm almost</p> <p>19 certain they're in Florida, you don't have to</p> <p>20 answer that, but that's where I got they're calling</p> <p>21 from the East Coast because they're based in</p> <p>22 Florida.</p> <p>23 Q Okay. Did anybody --</p> <p>24 A I don't quite know how they got an</p>	Page 46	<p>1 somebody I know, somebody got a new number,</p> <p>2 something like that. But typically in my past</p> <p>3 relationship with creditors they call from like 800</p> <p>4 numbers, not like 872 Chicago numbers. It's weird.</p> <p>5 They're not even in Chicago.</p> <p>6 Q So in the past have you answered phone</p> <p>7 calls from 866 numbers and 800 numbers?</p> <p>8 A I have.</p> <p>9 QOkay. And typically that's when you find</p> <p>10 they're debt collection companies?</p> <p>11 A Correct. Uh-huh.</p> <p>12 QOkay. Do you have any friends and family</p> <p>13 members who live outside of Illinois?</p> <p>14 AI do.</p> <p>15 QAnd where do they live?</p> <p>16 AI have a brother and a sister in Texas.</p> <p>17 I have family actually in Florida, believe it or</p> <p>18 not. I have family in California. I have family</p> <p>19 everywhere.</p> <p>20 QOh, wow. So do you travel to Florida to</p> <p>21 visit family?</p> <p>22 AI've traveled to Florida several times,</p> <p>23 yeah, for family and personal reasons.</p> <p>24 QAnd what family members live in Florida?</p>	Page 48
<p>1 Illinois phone number.</p> <p>2 Q Did anybody you spoke with on the phone</p> <p>3 tell you that they were calling from Florida?</p> <p>4 A No, no. These people wouldn't even tell</p> <p>5 me their name. They just kept saying HRRG, and I'm</p> <p>6 like, "What does that mean?" Then finally the lady</p> <p>7 was like, "Oh, Healthcare Revenue Recovery Service"</p> <p>8 or something weird.</p> <p>9 Q Okay. Now paragraph 8 it indicates that</p> <p>10 you were misled into believing that a relative or</p> <p>11 friend was calling you, so could you explain that a</p> <p>12 little bit more?</p> <p>13 A Yeah. When I was saying that I was</p> <p>14 saying that, you know, typically debt collectors</p> <p>15 they call from like 800, 866, something like that.</p> <p>16 This was like a regular phone call, so I'm like,</p> <p>17 oh, who is this so I answered it. Oh, it's a debt</p> <p>18 collector. They're not calling from like an 888,</p> <p>19 866, 800.</p> <p>20 You know, in the past I guess that was</p> <p>21 the thing, but now I guess the new thing is to call</p> <p>22 from a city where the person is. So it's Chicago,</p> <p>23 and, of course, Chicago, even if it's not saving</p> <p>24 your number, you're going to be like, oh, this is</p>	Page 47	<p>1 A I have an aunt that lives in Florida,</p> <p>2 some cousins.</p> <p>3 Q Okay. Now, do you have any reason to</p> <p>4 believe that the telephone number that appeared on</p> <p>5 your phone was not Healthcare Revenue Recovery</p> <p>6 Group's telephone number?</p> <p>7 A Do I have reason to believe that that was</p> <p>8 not their phone number?</p> <p>9 Q Right.</p> <p>10 A No, I don't have reason to believe that.</p> <p>11 Q Okay. So as far as your understanding is</p> <p>12 Healthcare Revenue Recovery Group's telephone</p> <p>13 number, that is a local telephone number?</p> <p>14 A That is correct.</p> <p>15 Q Okay. Now paragraph number 12, is</p> <p>16 this -- or, excuse me, let me go back to paragraph</p> <p>17 11. So when we kind of went through that timeline</p> <p>18 earlier you mentioned a first telephone call and</p> <p>19 you indicated you couldn't exactly remember about</p> <p>20 the time it is. In your complaint you indicated it</p> <p>21 was in March 2021. Does that still sound correct</p> <p>22 to you?</p> <p>23 A That's possible. I know it's been a</p> <p>24 while. It's possible. It seems like forever ago</p>	Page 49

<p style="text-align: right;">Page 50</p> <p>1 to me. It's possible that it was March 2021 based 2 on those phone records with that particular number, 3 the 872 number. Honestly, I do believe that I 4 spoke with them from another number before this, 5 but that 872 number started coming in 6 March according to the phone records.</p> <p>7 Q Okay. And that was to your cell phone 8 number, right?</p> <p>9 A Correct, my personal cell phone number.</p> <p>10 Q In paragraph 12 it mentions that 11 Healthcare Revenue Recovery Group state -- excuse 12 me, that defendant stated it could not communicate 13 further with Ms. Atkins unless she disclosed her 14 personal information, so is this similar to what we 15 were talking about before when you described --</p> <p>16 A That's correct. Uh-huh.</p> <p>17 Q Okay. Do you have any recollection of 18 how long that telephone conversation lasted?</p> <p>19 A No, I don't remember that.</p> <p>20 Q Do you think it was less than five 21 minutes?</p> <p>22 A Yeah, I'm sure it was less than five 23 minutes. I would not be going back and forth with 24 her for anything over five minutes.</p>	<p style="text-align: right;">Page 52</p> <p>1 Q Is there another -- is there another 2 phone record besides the one that I shared with you 3 about 15 minutes ago with those two April telephone 4 calls?</p> <p>5 A Yes. Yeah, there's another one.</p> <p>6 MS. EASOM: Okay. Paul, do you mind 7 sending that over to me?</p> <p>8 MR. CAMARENA: Yeah, I'm -- I'm not 9 entirely sure what Ms. Atkins is referring to, but 10 whatever we have I will get to you.</p> <p>11 MS. EASOM: Okay.</p> <p>12 BY MS. EASOM:</p> <p>13 Q Now, Ms. Atkins, if you do locate any 14 other screenshots that show the telephone calls 15 that you received and if you could just send that 16 over to Paul so he can share with me that would be 17 great.</p> <p>18 A Okay.</p> <p>19 Q Because right now I only have that one 20 screenshot showing the two calls in April, so if 21 you find any other screenshots or telephone records 22 if you could share those with Paul that would be 23 great.</p> <p>24 MR. CAMARENA: I'll get them, Brittani,</p>
<p style="text-align: right;">Page 51</p> <p>1 Q And do you remember who disconnected the 2 call? Was it you or was it Healthcare Revenue 3 Recovery Group?</p> <p>4 A It was Healthcare Revenue Recovery Group. 5 I told her that I wasn't going to be, you know, 6 talking to her further and I wasn't going to give 7 her my information.</p> <p>8 Q Okay.</p> <p>9 A So we mutually agreed that the phone call 10 wasn't going any further, so...</p> <p>11 Q Paragraph 14, it indicates that 12 Healthcare Revenue Recovery Group continued to 13 place at least five more telephone calls. Do you 14 remember when those calls were made?</p> <p>15 A I don't remember exactly. I did give the 16 phone records to Attorney Paul, and you guys should 17 have those phone records as well. So you can see 18 that there are well over five more calls made after 19 that. I don't have it written down, I don't have 20 the specific dates, but if you access the phone 21 record that was sent or I don't know if you have it 22 or not but Attorney Paul definitely has that phone 23 record and you'll see the phone calls that were 24 made.</p>	<p style="text-align: right;">Page 53</p> <p>1 and I'll forward over to Krista.</p> <p>2 THE WITNESS: Okay. Okay. That's fine.</p> <p>3 BY MS. EASOM:</p> <p>4 Q And those five other telephone calls, did 5 you answer any of those calls?</p> <p>6 A No.</p> <p>7 Q Okay. Paragraph 15 of your complaint 8 indicates in April 2021 Healthcare Revenue Recovery 9 Group called you again and that's when you answered 10 it and Healthcare Revenue Recovery Group 11 disconnected the call without making any statement 12 at all. Now, is this the same telephone call that 13 we were talking about earlier, that second 14 telephone call?</p> <p>15 A Yes, that's the same one. Uh-huh.</p> <p>16 Q Okay. And before you answered the 17 telephone did you know that Healthcare Revenue 18 Recovery Group was calling you?</p> <p>19 A No. Again, I just -- I looked at the 20 phone, 872, who is this. So I answered it.</p> <p>21 "Hello? Hello? Hello?" And nothing. And then I 22 heard like, you know, when there's nobody else on 23 the phone and then the call like, like call ended.</p> <p>24 Well, okay, cool.</p>

<p style="text-align: right;">Page 54</p> <p>1        So I called it back. Then they're 2 like, "Oh, this is HRRG." So now I'm like trying 3 to get to the bottom of it, same thing like I said 4 earlier, gave the girl my information, we had a 5 conversation about it, et cetera.</p> <p>6        Q    Okay. And why do you think Healthcare 7 Revenue Recovery Group was calling you in 8 April 2021?</p> <p>9        A    I guess for \$27.24.</p> <p>10        Oh, boy. I'm literally on Zoom court 11 for \$27. It's interesting.</p> <p>12        Q    And when you called Healthcare Revenue 13 Recovery back, was there any explanation as to why 14 the call was -- prior call was disconnected?</p> <p>15        A    No. She was just like, "Oh, I'm sorry." 16 She did say that it wasn't her specifically that 17 called me, but if anyone from her company, you 18 know, hung up on me they shouldn't have done that 19 and she kind of apologized on their behalf but she 20 said it was not her that specifically called me.</p> <p>21        Q    Okay.</p> <p>22        A    So I don't know if like multiple people 23 will share that number, I guess, but she kept 24 saying that it wasn't her specifically.</p>	<p style="text-align: right;">Page 56</p> <p>1        this?" And she's like, "Oh, this is HRRG." 2        So I'm like (indicating). "What do 3 you want? Why do you keep calling me? At this 4 point I'm just going to give you the information 5 because you're really pissing me off, you're 6 calling me, and then when I do answer the phone you 7 hang up on me."</p> <p>8        So, yes, I was very upset. Very 9 upset.</p> <p>10        Q    Now in that April telephone call do you 11 remember where you received the call?</p> <p>12        A    It was home.</p> <p>13        Q    You were at home, okay. Do you remember 14 what you were doing?</p> <p>15        A    Actually, yeah, I believe I was like 16 getting dressed or something, which was even more 17 frustrating because I'm here trying to put my 18 makeup on and everything. I remember specifically 19 being in the bathroom, so I know I was doing 20 something. I was getting dressed, putting on my 21 makeup, doing all this other stuff. And I'm like, 22 "Yeah, who is this?"</p> <p>23        The fact that I answered the phone and 24 you hung up interrupting my day while I'm doing</p>
<p style="text-align: right;">Page 55</p> <p>1        Q    And what made you refrain from blocking 2 that telephone number after that last telephone 3 call?</p> <p>4        A    Oh, I mean, I don't really -- I'm not a 5 blocker. Like I don't really -- I don't block 6 numbers. Like it just is what it is. I don't have 7 probably any numbers blocked on my phone actually.</p> <p>8        Q    It says here in your complaint that after 9 the telephone call was disconnected you were upset 10 and you began to tremble. Do you remember that?</p> <p>11        A    Yeah, I remember that.</p> <p>12        Q    Okay. So were you upset after the 13 telephone call?</p> <p>14        A    Oh, yeah. I was very upset. I don't 15 like -- people would say that I'm a brat, but I'm 16 not -- I don't know how to explain like my actions 17 how I act sometimes, but it's like who is this 18 hanging up on me, like why would they hang up on 19 me, so I'm like (indicating). Like I was like 20 holding in my cursing words, but, you know, I'm 21 like who the heck is this. Like who keeps me 22 calling me and why would they hang up.</p> <p>23        So I called them back and I was about 24 to get like really angry and then I'm like, "Who is</p>	<p style="text-align: right;">Page 57</p> <p>1        something, that's what made me so mad because I'm 2 like, first of all, these people keep calling me 3 from this number. Like who the heck is this. So 4 then when I do answer you hang up. What's the 5 point of you keep calling me, then when I answer 6 the phone you going to hang up?</p> <p>7        So, yeah, I called back. I didn't -- 8 I called back like, you know, I was about to snap, 9 but then they're like, "Oh, this is HRRG." So I 10 kind of like reeled it in, like (indicating), 11 because I thought it was somebody like playing on 12 my phone and I was about to like go there with 13 them, like stop playing on my phone, but ended up 14 being you guys. Well, not you but the person that 15 you represent.</p> <p>16        Q    Now, do you -- did you -- now at this 17 point, April 2021, you were no longer working at 18 Southwest, correct?</p> <p>19        A    Right.</p> <p>20        Q    Okay. Do you remember if you -- excuse 21 me. Strike that.</p> <p>22        Did you go see any healthcare 23 providers after receiving those telephone calls 24 from Healthcare Revenue Recovery Group?</p>

<p style="text-align: right;">Page 58</p> <p>1 A I did not see any healthcare -- regarding 2 this situation or period?</p> <p>3 Q Regarding this situation.</p> <p>4 A No, I did not go and see any healthcare 5 providers regarding this situation.</p> <p>6 Q Okay. Have you ever treated before for, 7 you know, any emotional distress?</p> <p>8 A No.</p> <p>9 Q Have you ever seen a therapist before?</p> <p>10 A No.</p> <p>11 Q Okay. Or have you ever seen someone who 12 is similar to a therapist, like a counselor or 13 something like that?</p> <p>14 A I mean, in my entire life?</p> <p>15 Q Yes.</p> <p>16 A Or regarding this situation?</p> <p>17 Q In your entire life.</p> <p>18 A Yeah, in my entire life I've seen a 19 counselor, you know, like my regular, you know, 20 college counselors and, you know, people that you 21 can confide in, my pastor.</p> <p>22 Q Okay.</p> <p>23 A Like when you need to talk but not like 24 therapy, an emotional therapist.</p>	<p style="text-align: right;">Page 60</p> <p>1 know if it was a she or he, they, the company, kept 2 calling me after I told them to take me out of the 3 database. For two, they hung up on me when they 4 called instead of just talking. I don't know. 5 That was weird. Like there's no real reason to 6 hang up on me.</p> <p>7 So those were the two major things 8 that went wrong here in my personal opinion because 9 if I tell you to stop calling, in my opinion and my 10 understanding of the law is you have to stop 11 calling me. Whether you believe I have business 12 with you or I believe that I don't, if I 13 specifically say take me out of the database then 14 you should probably just take me out of the 15 database and just deal with it some other type of 16 way or something. I don't know how they're 17 supposed to deal with it if I say don't call, but I 18 do feel like my understanding of the law is you 19 cannot call me once I say don't call me.</p> <p>20 Q Do you believe that Healthcare Revenue 21 Recovery Group was deceptive in any way?</p> <p>22 A I believe that they -- the original 23 deception came from them calling from Illinois and 24 they're in Florida.</p>
<p style="text-align: right;">Page 59</p> <p>1 Q Okay. And I know -- I think you already 2 answered this question before, but after these 3 telephone calls did you talk to anybody about what 4 happened in terms of the allegations in your 5 complaint against Healthcare Revenue Recovery 6 Group?</p> <p>7 A Anyone outside of Attorney Paul? No, I 8 did not.</p> <p>9 Q Okay. In your own words, if you don't 10 mind, could you kind of tell us what you believe 11 Healthcare Revenue Recovery Group did wrong here?</p> <p>12 A For one, I told them I did not have any 13 business with them, take me off the database, 14 figured it had to be some type of database, it was 15 something that, you know, was wrong because I know 16 I didn't have any business with them. So I told 17 them to take me off the database, I don't have any 18 business with them specifically.</p> <p>19 She began to say that I do have 20 business with them. She wouldn't tell me what 21 business it was unless I gave her my personal 22 information. So then I told her just take me off 23 the database. She kept -- they kept calling, I 24 don't want to keep saying "she" because I don't</p>	<p style="text-align: right;">Page 61</p> <p>1 Q Okay.</p> <p>2 A That's kind of deceiving, right?</p> <p>3 Q Do you have any reason to believe the 4 balance from Little Company of Mary was incorrect?</p> <p>5 A I don't have reason to believe that. I 6 mean, it could be correct, it could not be correct. 7 I don't really believe that I -- I would not be 8 harassing me at this level for \$27.</p> <p>9 Yeah. I -- like I said, I didn't know 10 the balance or anything. Before I called her back 11 that time she would not give me any information, so 12 I had no idea what the balance was. She's the one 13 who told me the balance. I don't have any way of 14 knowing if it's correct or incorrect at this point. 15 I haven't even gotten into all of that with United 16 Healthcare or anything. It's \$27.</p> <p>17 (Document was marked Exhibit 6 18 for identification.)</p> <p>19 BY MS. EASOM:</p> <p>20 Q We're going to shift gears a little bit 21 and kind of just go over some of the disclosures 22 that your attorney has sent over our way in this 23 case.</p> <p>24 So I'm going to share my screen again.</p>

Page 62	Page 64
<p>1 Can you let me know what you see at the top, this 2 line right here where my mouse is?</p> <p>3 A Plaintiff's Rule 26(a)(1) disclosures.</p> <p>4 Q Okay. Now, have you ever seen this 5 document before? And it's okay if you haven't.</p> <p>6 A I don't believe that I have.</p> <p>7 Q Okay. It indicates here that there's no 8 individuals that have, you know, any additional 9 information about your allegations or your damages.</p> <p>10 Is that accurate?</p> <p>11 A That's accurate.</p> <p>12 Q Okay. It indicates here that you may be 13 obtaining telephone records. Did you ever request 14 any records from T-Mobile?</p> <p>15 A Yeah.</p> <p>16 Q You requested records from T-Mobile?</p> <p>17 A I have -- the records are in my account. 18 Like I don't have to request them. I have them.</p> <p>19 Q Oh, like an online portal where you can 20 log in and you can see?</p> <p>21 A Uh-huh.</p> <p>22 Q Would you be able to, you know, log in 23 and go through those records and provide Paul with 24 any documents from, you know, March 2021 to</p>	<p>1 damages caused by foregone credit opportunities -- 2 MR. CAMARENA: Krista?</p> <p>3 MS. EASOM: Yes.</p> <p>4 MR. CAMARENA: Would you allow me to 5 withdraw that now? That should not have been in 6 there. It must have copied and pasted from a 7 wrong --</p> <p>8 MS. EASOM: Yes.</p> <p>9 MR. CAMARENA: Let me withdraw that 10 economic damages paragraph.</p> <p>11 MS. EASOM: Okay; great.</p> <p>12 June, could you make sure the record 13 reflects that plaintiff will be withdrawing 14 economic damages caused by foregone credit 15 opportunities from their claimed damages.</p> <p>16 BY MS. EASOM:</p> <p>17 Q All right. So this last line here, it 18 indicates damages for emotional distress. You 19 know, if you had to provide us with a figure in 20 terms of what damages you incurred from emotional 21 distress, what would that figure look like?</p> <p>22 A The figure would be upwards of a thousand 23 dollars.</p> <p>24 Q And how are you kind of coming to that</p>
Page 63	Page 65
<p>1 April 2021?</p> <p>2 A I can.</p> <p>3 Q Okay; great.</p> <p>4 Moving on, we have a list of damages 5 that you're claiming here. Right here it says 6 reasonable attorney's fees and costs. Have you 7 made any payments to Mr. Camarena for any of the 8 costs related to this action yet?</p> <p>9 A No, not at this time.</p> <p>10 Q Okay. And do you have any idea what his 11 hourly rate is?</p> <p>12 A No, not really. Not exactly hourly.</p> <p>13 Q Okay. And statutory damages of up to 14 \$1,000, that's in relation to the Fair Debt 15 Collection Practices Act. Have you ever -- or 16 excuse me. Do you know what the Fair Debt 17 Collection Practices Act is?</p> <p>18 A It's familiar.</p> <p>19 Q Okay. Is it your understanding that, you 20 know, violations of that Act is the basis of your 21 complaint against Healthcare Revenue Recovery 22 Group?</p> <p>23 A Yes, that's correct.</p> <p>24 Q Okay. Right here it says economic</p>	<p>1 figure? Is it based on any receipts or any -- you 2 know, any costs that you incurred after the 3 telephone calls?</p> <p>4 A No, I don't have any receipts to kind of 5 calculate that.</p> <p>6 Q Okay.</p> <p>7 A I do not.</p> <p>8 Q Have you ever filed a lawsuit before?</p> <p>9 A I have.</p> <p>10 Q Okay. And what was the nature of your 11 claims in that other lawsuit?</p> <p>12 A Almost the same as this one, but it was a 13 different creditor.</p> <p>14 Q Okay. And was it also filed in Illinois?</p> <p>15 A It was.</p> <p>16 Q And do you recall when that case was 17 filed?</p> <p>18 A Earlier this year, I believe.</p> <p>19 Q Do you know if --</p> <p>20 A I want to say earlier this year.</p> <p>21 Q Who is the named defendant in that case?</p> <p>22 A FlexShopper or whoever was representing 23 FlexShopper, whoever was representing them. I have 24 to pull that information, but it was some creditor</p>

<p style="text-align: right;">Page 66</p> <p>1 that was representing FlexShopper.</p> <p>2 Q Okay. And do you know if that complaint</p> <p>3 was also filed in the Northern District of Illinois</p> <p>4 similar to this complaint?</p> <p>5 A Yes, it was.</p> <p>6 Q Could you kind of just give us an</p> <p>7 overview of the allegations you make against the</p> <p>8 company who represented FlexShopper?</p> <p>9 A Yes. So with them, they, too, were</p> <p>10 calling after I told them don't call. I think it</p> <p>11 was IBS or ID -- it was some other person that I</p> <p>12 had no business with. And they kept calling me</p> <p>13 also, and then they called my sister, which they</p> <p>14 did not have legal right to do, gave her my</p> <p>15 personal information as it relates to like the debt</p> <p>16 and everything at FlexShopper, which they did not</p> <p>17 have permission to do. So I filed a complaint</p> <p>18 against them.</p> <p>19 Q Okay. And do you recall when FlexShopper</p> <p>20 or the company who was representing them started</p> <p>21 calling you?</p> <p>22 A Oh, probably like last year or something.</p> <p>23 Q And then the complaint that you filed,</p> <p>24 did you file it this year?</p>	<p style="text-align: right;">Page 68</p> <p>1 MR. CAMARENA: Yeah, it was in the</p> <p>2 Northern District. Same court.</p> <p>3 MS. EASOM: Northern District. Okay.</p> <p>4 Let me just make sure I can...</p> <p>5 CR. You mean CV?</p> <p>6 MR. CAMARENA: CV. I'm sorry. I do a</p> <p>7 lot of these, so...</p> <p>8 MS. EASOM: Okay. 21-cv-1484?</p> <p>9 MR. CAMARENA: Let me -- just one second.</p> <p>10 It's 21-cv-1484, yes. If you want I</p> <p>11 can e-mail you a copy of the complaint that has the</p> <p>12 ECF docket number and filing on top.</p> <p>13 MS. EASOM: Oh, okay. I have it here.</p> <p>14 Okay. Thank you.</p> <p>15 MR. CAMARENA: You're welcome.</p> <p>16 BY MS. EASOM:</p> <p>17 Q Ms. Atkins, could you let us know what</p> <p>18 the outcome of that case was? Did you ever do a</p> <p>19 deposition in that case, Atkins versus FlexShopper?</p> <p>20 A I did not have to do anything like this I</p> <p>21 know. They basically got found guilty of what I</p> <p>22 was saying. They basically said that that</p> <p>23 happened --</p> <p>24 MR. CAMARENA: I have to object because</p>
<p style="text-align: right;">Page 67</p> <p>1 A I believe it was this year.</p> <p>2 THE WITNESS: That was this year, right?</p> <p>3 MR. CAMARENA: I can't answer.</p> <p>4 THE WITNESS: Oh. Sorry.</p> <p>5 MR. CAMARENA: But Krista can look it up</p> <p>6 on Pacer. Krista can --</p> <p>7 THE WITNESS: No, sorry. I was talking</p> <p>8 to Attorney Paul, but he can't answer.</p> <p>9 MR. CAMARENA: It's available publicly.</p> <p>10 THE WITNESS: Oh.</p> <p>11 MR. CAMARENA: Do you want me to answer,</p> <p>12 Krista?</p> <p>13 MS. EASOM: Yeah, that would be great.</p> <p>14 MR. CAMARENA: Just one second. Just</p> <p>15 give me a moment.</p> <p>16 MS. EASOM: Can you guys still see me?</p> <p>17 THE WITNESS: Yeah, we can see you.</p> <p>18 MS. EASOM: Okay. If you could just give</p> <p>19 me the case number, that would be great.</p> <p>20 MR. CAMARENA: Sure. It's 21 CV, or CR,</p> <p>21 1484, Atkins and Atkins-Martins, who is her sister,</p> <p>22 versus FlexShopper and A.R.M. L.L.C.</p> <p>23 MS. EASOM: And was that filed in the</p> <p>24 State of Illinois?</p>	<p style="text-align: right;">Page 69</p> <p>1 there's a confidentiality agreement in that,</p> <p>2 Krista.</p> <p>3 BY MS. EASOM:</p> <p>4 Q Okay. So just so I make sure I</p> <p>5 understand, Ms. Atkins -- and, Paul, feel free to</p> <p>6 jump in -- did you sign a settlement agreement?</p> <p>7 A Yes.</p> <p>8 Q Okay.</p> <p>9 MR. CAMARENA: And I'll object to her</p> <p>10 talking about that because that settlement</p> <p>11 agreement has a confidentiality section.</p> <p>12 MS. EASOM: Okay. Of course.</p> <p>13 THE WITNESS: Sorry.</p> <p>14 MR. CAMARENA: That's all right.</p> <p>15 MS. EASOM: No, that's okay. All right.</p> <p>16 MR. CAMARENA: She's going to want to --</p> <p>17 well, if there's a settlement every party wants us</p> <p>18 to, you know, comply with their confidentiality</p> <p>19 requirement.</p> <p>20 MS. EASOM: Of course.</p> <p>21 BY MS. EASOM:</p> <p>22 Q I'm going to share my screen with you</p> <p>23 again. Thank you for bearing with me.</p> <p>24 Okay. So is this the complaint in the</p>

<p>1 other case that you were just describing?</p> <p>2 Can you still hear me?</p> <p>3 A That's correct. This is it.</p> <p>4 Q Okay. And you had an outstanding debt</p> <p>5 that FlexShopper was contacting you about in this</p> <p>6 case?</p> <p>7 A Correct.</p> <p>8 Q Okay. And in this case you also allege</p> <p>9 violations of the Fair Debt Collection Practices</p> <p>10 Act; is that right?</p> <p>11 A That's correct.</p> <p>12 Q Okay. And in this case it's a little bit</p> <p>13 different from our case in the sense that it looks</p> <p>14 like you received calls from a Texas telephone</p> <p>15 number; is that right?</p> <p>16 A Correct. Yep, that's correct.</p> <p>17 Q Okay. And then you answered those</p> <p>18 telephone calls from the Texas number?</p> <p>19 A That's correct.</p> <p>20 Q Okay. And did the defendant in that case</p> <p>21 also call your personal cell phone?</p> <p>22 A That's correct.</p> <p>23 Q Okay. In that case did you also, you</p> <p>24 know, ask the person who was calling to stop</p>	<p>Page 70</p> <p>1 or supposed to have gotten the debt, not A.R.M.</p> <p>2 So the fact that they were calling my</p> <p>3 sister multiple times a day, hung up on her, and</p> <p>4 they were calling me after I told them not to call</p> <p>5 in my opinion of the law was a violation.</p> <p>6 BY MS. EASOM:</p> <p>7 Q Okay. Now I'm not asking you to, you</p> <p>8 know, discuss any terms of the confidential</p> <p>9 settlement agreement you signed. Just as it</p> <p>10 relates to the damages you experienced related to</p> <p>11 the defendant's conduct in this case, what sort of</p> <p>12 damages did you incur after FlexShopper and the</p> <p>13 named defendants in this case contacted you?</p> <p>14 A Well, it was emotional for sure. Like me</p> <p>15 and my sister are like -- we are back now to like</p> <p>16 besties, but at the time she's like, you know, "Why</p> <p>17 are you giving these people my number?" These</p> <p>18 people are like calling her at all times of day.</p> <p>19 Like she was working from home at that time. She's</p> <p>20 been working from home since before it was a trend</p> <p>21 with the pandemic, so she's like, "I don't have</p> <p>22 time for this." Like, "Why would you give these</p> <p>23 people my number?"</p> <p>24 So we like got heated for a while. It</p>
<p>1 calling you?</p> <p>2 A I did.</p> <p>3 Q And in that case was a call also</p> <p>4 disconnected?</p> <p>5 A Disconnected or hung up? Yes. They just</p> <p>6 kept calling me, and then they called my sister and</p> <p>7 they hung up on my sister.</p> <p>8 Q Okay. Now, were you and your sister both</p> <p>9 on the account that they were trying to collect on?</p> <p>10 A No.</p> <p>11 The original account with</p> <p>12 FlexShopper -- I don't know. Am I supposed to be</p> <p>13 saying this, Attorney Paul?</p> <p>14 MR. CAMARENA: That's fine. It's just</p> <p>15 the settlement that we can't talk about.</p> <p>16 THE WITNESS: Okay. The original account</p> <p>17 with FlexShopper has you put like references and</p> <p>18 everything, so my sister was one of the references,</p> <p>19 my mom was one of them, and a couple other people.</p> <p>20 But at no point did FlexShopper have -- they</p> <p>21 shouldn't -- my understanding they should not have</p> <p>22 given A.R.M. L.L.C. my sister's personal</p> <p>23 information without consent because it was okay for</p> <p>24 FlexShopper, FlexShopper was the original collector</p>	<p>Page 71</p> <p>Page 73</p> <p>1 was very, you know, bad because we don't really do</p> <p>2 that. We have like matching tattoos and everything.</p> <p>3 But so that was like really sad for me because I'm</p> <p>4 like damn -- I mean darn, you guys are causing</p> <p>5 discord among my family.</p> <p>6 Q Now, do you remember around what time of</p> <p>7 the year, you know, the month and the date, that</p> <p>8 you kind of were experiencing some frustration as</p> <p>9 it relates to this complaint and you were having a</p> <p>10 disagreement with your sister?</p> <p>11 A Yeah. It was probably like the beginning</p> <p>12 of the year. I want to say it was like right</p> <p>13 around this -- this time here. Whenever this</p> <p>14 happened it was like right around that time, which</p> <p>15 right before I contacted Attorney Paul because I'm</p> <p>16 like I need somebody to, you know, stop this --</p> <p>17 stop this from -- stop these people from calling,</p> <p>18 and then Attorney Paul was a referral from a friend</p> <p>19 of mine so she's like, "Oh, call this guy and he's</p> <p>20 going to help you make them stop calling you."</p> <p>21 Q Okay.</p> <p>22 A So I'm like, "Okay, cool." And then we</p> <p>23 went through all of this and I told him like</p> <p>24 everything that happened, like I'm like, "They</p>

<p>1 can't call me, right, if I tell them not to call  2 me?" And he's like, "Yeah, that's true," and this,  3 that, and the other. So we went ahead with this.  4 Q And it looks like this complaint was  5 filed March 17th, 2021, so all this happened --  6 A So like the first beginning of the year.  7 Uh-huh.  8 Q Okay. So all this happened before -- or  9 I guess you filed this complaint around the same  10 time you received that first telephone call from  11 Healthcare Revenue Recovery Group; does that sound  12 about right?  13 A That could be possible.  14 Q Okay. And one more question. Sherhonda  15 Atkins-Martin, that's your sister, correct?  16 A Correct.  17 Q Does she have any knowledge about the  18 allegations against Healthcare Revenue Recovery  19 Group?  20 A She does not.  21 MS. EASOM: Okay. June, can we mark  22 this, this complaint, as Exhibit 5?  23 THE REPORTER: Were you going to mark the  24 prior complaint that you had? So that would be 6,</p>	Page 74	<p>1 Facebook account?  2 A I do.  3 Q Okay. Did you -- did you post on social  4 media anything about the allegations against  5 Healthcare Revenue Recovery Group?  6 A No.  7 Q Okay. Did you post anything on Twitter  8 or on Instagram?  9 A No.  10 Q Okay. So besides that lawsuit that we  11 just talked about against FlexShopper, are there  12 any other complaints that you filed against  13 anybody?  14 A No.  15 Q Okay. And we are going to switch gears  16 and go over your interrogatories, so it's just a  17 set of questions that -- written questions that we  18 sent out to Paul and you may have seen, so I'm  19 going to share my screen with you again.  20 MS. EASOM: And, June, this is going to  21 be Exhibit 8 now I think we're on?  22 THE REPORTER: Yes.  23 (Document was marked Exhibit 8  24 for identification.)</p>	Page 76
<p>1 and this would be 7.  2 MS. EASOM: We'll do Atkins versus  3 Healthcare Revenue Recovery Group as 6 and then  4 Atkins versus Brad Bernstein d/b/a FlexShopper as 7.  5 (Document was marked Exhibit 7  6 for identification.)  7 BY MS. EASOM:  8 Q So the emotional distress that you  9 experienced in that other case, is it similar to  10 what you experienced after the telephone calls from  11 Healthcare Revenue Recovery Group?  12 A Similar but not the same, no. It was a  13 different type of emotions with that. This  14 emotional roller coaster came because of something  15 totally different and because of something  16 different, and that particular emotional roller  17 coaster came from specifically being hung up on.  18 Now, those people did not hang on me,  19 they hung up on my sister, but I was emotionally  20 upset about that because my sister and I were not  21 seeing eye to eye. Really doesn't have anything to  22 do with HRRG. That set of emotions was different.  23 That was personal only.  24 Q Okay. Now, did you -- do you have a</p>	Page 75	<p>1 BY MS. EASOM:  2 Q Can you let me know what you see now at  3 the top of your screen? Actually, no, I'm sorry.  4 Yeah, here we go.  5 Do you see Plaintiff's Responses to  6 Defendant HRRG's First Set of Interrogatories?  7 A Uh-huh. I see that.  8 Q Do you remember reviewing this document?  9 A I do.  10 Q Okay. So everything in here is accurate  11 as far as you know, all of the responses to our  12 questions are true and accurate?  13 A Yes, as far as I know they're accurate.  14 Q Okay. So the first question here, I know  15 you said you've never been married, do you have any  16 nicknames or any other names that you go by?  17 A No.  18 Q Okay. I'm going to skip over this one.  19 Do you have any documents at all from  20 Little Company of Mary or from Healthcare Revenue  21 Recovery Group?  22 A No. In my possession? No, I don't have  23 anything from either one of them.  24 Q Did you ever exchange any e-mail</p>	Page 77

<p style="text-align: right;">Page 78</p> <p>1 communications with Little Company of Mary and    2 Healthcare Revenue Recovery Group?</p> <p>3 A I did not.</p> <p>4 Q Okay. And you -- do you recall receiving    5 any bills from Little Company of Mary back in 2019?</p> <p>6 A I don't recall receiving anything from    7 them.</p> <p>8 Q And it says here do you recall visiting    9 Healthcare Revenue Recovery Group's website after    10 you received the telephone calls?</p> <p>11 A I don't remember visiting their website    12 specifically. I don't even know if they have a    13 website, but I remember like putting in like is    14 this place like legit because when I thought they    15 were trying to like scam me, get my information, I    16 was like, you know, you can go on like Red --    17 Redfin or something like that. I have like an app.</p> <p>18 Earlier you asked me if I Googled    19 them. I didn't specifically Google them, but    20 there's an app called like Redfin or something and    21 you can go on there and see if like a company is    22 like legit or something just in case somebody like    23 trying to get your identity.</p> <p>24 Q I'm sorry. What was the name of that</p>	<p>1 Reddit.</p> <p>2 Q Reddit, okay. Now, do you remember if    3 you -- if you tried to find information about    4 Healthcare Revenue Recovery Group on that app?</p> <p>5 A I put them in there.</p> <p>6 Q Okay. But you don't recall if you    7 learned any information after you searched    8 Healthcare Revenue Recovery Group?</p> <p>9 A Yeah, I'm thinking now that that's where    10 I found out that they were in Florida and that    11 they -- well, I knew they were a collection agency    12 because she opened up that call with, you know,    13 that, that second one when I was saying that,    14 but -- when they said they were going to be    15 monitoring and recording the call. But, yeah, if    16 you look on Reddit, if you look on there it will    17 tell you.</p> <p>18 Q Okay. Thank you.</p> <p>19 I don't think I got your full date of    20 birth. Do you mind just letting me know your date    21 of birth?</p> <p>22 A [REDACTED].</p> <p>23 Q Okay. And you have been a customer of    24 T-Mobile's from 2019 to present?</p>
<p style="text-align: right;">Page 79</p> <p>1 website?</p> <p>2 A I think it's like an app. I think it's    3 like Redfin or something. Red -- I mean, I know    4 I'm not supposed to look at my phone, but I can    5 look at it and tell you if you want me to.</p> <p>6 Q Yeah, that would be fine. And it's an    7 app that tells you if a company is like a scam --</p> <p>8 A No, no. It's an app where you can ask    9 like a bunch of different questions and people will    10 like chime in. It's not like specifically for    11 that, but you can ask like questions on there    12 that's like that. Like, oh, is GGG legit or, oh,    13 is Paul Camarena, is he like a good lawyer, or like    14 stuff like that. And people will tell you like    15 what they think, like if they've ever had like any    16 interaction with these people or if they know or if    17 they don't or something like that.</p> <p>18 Q Okay.</p> <p>19 A And you can ask a bunch of stuff like    20 stock tips and stuff. You can ask pretty much    21 anything you want.</p> <p>22 Hold on. I will tell you right now.</p> <p>23 Redfin or something. Oh, no, Redfin    24 is the real estate one. It's Reddit. Sorry. It's</p>	<p>1 A Oh, yeah. Been with them since high    2 school.</p> <p>3 Q Okay. Are there any other people who are    4 on your cellular phone account with T-Mobile?</p> <p>5 A Just me. I have a phone for my son, if    6 that's what you mean.</p> <p>7 Q Okay. So it's your two phones --</p> <p>8 A I am the primary holder. I have a phone    9 for him, an iPad for him.</p> <p>10 Q Okay.</p> <p>11 A I have these phones for me. But nobody's    12 like name, no. Nobody's name appears on my stuff    13 but me.</p> <p>14 Q We already went over that.</p> <p>15 Now, when you indicated you thought    16 that a friend or a relative could have been calling    17 you, did you have someone specific in mind?</p> <p>18 A No, but friends or relatives call this    19 number, so I didn't have anybody specific in mind.</p> <p>20 I just figured it was somebody who knew me who had    21 my phone number.</p> <p>22 Q And do you have --</p> <p>23 A Plus it was from Chicago, so I knew it    24 had to be somebody that must have known me from</p>

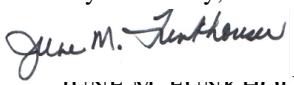
<p>1 Chicago.</p> <p>2 Q And your friends and family members, do</p> <p>3 you have all of their phone numbers saved in your</p> <p>4 cell phone?</p> <p>5 A Majority of them are saved, yeah.</p> <p>6 Q Have you ever received a telephone call</p> <p>7 from a family member from an unknown number like a</p> <p>8 police station or from, you know, another location</p> <p>9 where they were calling from?</p> <p>10 A Yeah, I have received a call from a</p> <p>11 family member that was calling from another number</p> <p>12 that was not their own, yeah. Even my son has</p> <p>13 called from another number, like when his phone</p> <p>14 dies he's like, "Oh, mom, you need to come pick me</p> <p>15 up." So it's not as rare as it might seem.</p> <p>16 Q Now, you kind of are split between Texas</p> <p>17 and Illinois. Would you say that anybody who calls</p> <p>18 you from a Texas number would be calling you from a</p> <p>19 local number?</p> <p>20 A Yeah. There's some people like my</p> <p>21 brother here is in Texas, my sister is in Texas, I</p> <p>22 have cousins in Texas, so those numbers are local.</p> <p>23 Like local numbers, yeah, Texas and Illinois</p> <p>24 mainly.</p>	<p>Page 82</p> <p>1 have to go with them.</p> <p>2 Q And was that like a voluntary position?</p> <p>3 A A lot of those cases did not go all the</p> <p>4 way to arbitration, it kind of -- you know, but a</p> <p>5 couple of them did. A couple cases went all the</p> <p>6 way. That's kind of like the final straw for those</p> <p>7 type of things, but a couple of the cases went to</p> <p>8 arbitration.</p> <p>9 Q And is that a voluntary position that you</p> <p>10 had?</p> <p>11 A Yeah, yeah, yeah, yeah. Yeah, it's</p> <p>12 voluntary.</p> <p>13 Q Okay.</p> <p>14 A It's a union thing.</p> <p>15 Q Now just so I can understand your</p> <p>16 background a little more completely, have you ever</p> <p>17 been arrested?</p> <p>18 A No.</p> <p>19 Q Okay. And have you ever been accused of</p> <p>20 a crime?</p> <p>21 A No.</p> <p>22 Q Okay. And have you ever been convicted</p> <p>23 of a crime?</p> <p>24 A No.</p>
<p>Page 83</p> <p>1 Q I'm just scanning through here to make</p> <p>2 sure that we covered everything.</p> <p>3 Have you ever attended an arbitration</p> <p>4 or a mediation?</p> <p>5 A For? In life?</p> <p>6 Q Yeah, like ever in relation to a lawsuit</p> <p>7 have you ever attended a trial, arbitration, or a</p> <p>8 mediation?</p> <p>9 A Yeah. I don't really know what it has to</p> <p>10 do with this, but I was a representative for the</p> <p>11 IAM, which is a unionized position. So I had to go</p> <p>12 to mediation/arbitration in Dallas all the time for</p> <p>13 that, but it's not relevant to this in any way.</p> <p>14 Q Okay. What's the IAM?</p> <p>15 A It's the International Association of</p> <p>16 Machinists and Aerospace Workers. It's the union</p> <p>17 for Southwest, so any time, you know, people would</p> <p>18 have to go have hearings and stuff for their jobs</p> <p>19 and everything then I would go with them to</p> <p>20 represent them and that sort of thing.</p> <p>21 Q Okay. You would represent co-workers'</p> <p>22 hearings related to --</p> <p>23 A If I was -- yeah, if I was the original</p> <p>24 union representative for that case, yes, I would</p>	<p>Page 83</p> <p>1 MS. EASOM: Do you -- Paul, I think you</p> <p>2 already answered this question, but do you intend</p> <p>3 to call any other witnesses to testify on your</p> <p>4 behalf at trial in this case?</p> <p>5 MR. CAMARENA: No.</p> <p>6 BY MS. EASOM:</p> <p>7 Q All right. I'm going to share my screen</p> <p>8 with you again. We're just going to go over</p> <p>9 your -- our production request.</p> <p>10 Now you indicated already, I just want</p> <p>11 to be a hundred percent certain, do you have any</p> <p>12 communications or documents or anything at all that</p> <p>13 you plan to use at trial in this case?</p> <p>14 A Me?</p> <p>15 MR. CAMARENA: I'm sorry --</p> <p>16 THE WITNESS: Or Paul?</p> <p>17 BY MS. EASOM:</p> <p>18 Q You, Ms. Atkins.</p> <p>19 A Oh, no, I don't have anything.</p> <p>20 Q Okay. So the only thing that you</p> <p>21 indicated you have are the screenshot that we</p> <p>22 discussed today, maybe there's another screenshot</p> <p>23 that could be out there that shows the other five</p> <p>24 missed calls?</p>

<p style="text-align: right;">Page 86</p> <p>1 A Yes.</p> <p>2 Q And the last -- the last thing would be</p> <p>3 your cell phone records that you're able to access</p> <p>4 through your T-Mobile account; is that right?</p> <p>5 A Correct.</p> <p>6 Q Okay. But there's no other documents or</p> <p>7 communications or anything like that that relate to</p> <p>8 your damages in this case?</p> <p>9 A No.</p> <p>10 (Document was marked Exhibit 9</p> <p>11 for identification.)</p> <p>12 BY MS. EASOM:</p> <p>13 Q Okay. I'm going to share my screen with</p> <p>14 you again, and we're going to go over your request</p> <p>15 for admissions. So it's okay if you haven't, but</p> <p>16 do you recall looking at this document before,</p> <p>17 Defendant HRRG's Requests for Admissions?</p> <p>18 A I do not recall seeing this one.</p> <p>19 Q Okay. Admission number 1, it indicates</p> <p>20 here that you owe a debt of 27.57 for services</p> <p>21 received by you from Little Company of Mary; is</p> <p>22 that accurate?</p> <p>23 A That's correct.</p> <p>24 Q Okay. It also indicates here that you</p>	<p style="text-align: right;">Page 88</p> <p>1 Q And have you received and answered</p> <p>2 telephone calls from unknown numbers in the past?</p> <p>3 A Have I? Yeah, I've received and answered</p> <p>4 unknown calls in the past.</p> <p>5 Q So in terms of the five telephone calls</p> <p>6 that you believe HRRG made to you after that</p> <p>7 initial telephone call, why do you believe that</p> <p>8 Healthcare Revenue Recovery Group was the entity</p> <p>9 making those telephone calls?</p> <p>10 A Because of their phone number.</p> <p>11 Q So the five calls that you didn't answer,</p> <p>12 it was from the same telephone number from the</p> <p>13 first call?</p> <p>14 A That's correct.</p> <p>15 Q Okay. In the past have you ever been</p> <p>16 speaking with somebody on the phone and the call</p> <p>17 disconnected for an unknown reason?</p> <p>18 A No. Not while I'm at home, or do you</p> <p>19 mean ever?</p> <p>20 Q Yeah, has there ever been an occasion</p> <p>21 where you're speaking with somebody on the phone</p> <p>22 and you lose service and the call disconnects and</p> <p>23 you need to call the person back?</p> <p>24 A Yeah. I mean, that happens to all of us,</p>
<p style="text-align: right;">Page 87</p> <p>1 owed consumer debts to other companies in 2021?</p> <p>2 A That's correct.</p> <p>3 Q Here it says -- I want to just get some</p> <p>4 clarification on this one just given our prior</p> <p>5 conversations today. It says here that you</p> <p>6 received telephone calls from debt collection</p> <p>7 agencies and creditors during the time period in</p> <p>8 question, which would be March 2021 and April 2021.</p> <p>9 Did you receive telephone calls from other debt</p> <p>10 collection agencies in March of 2021 and April of</p> <p>11 2021?</p> <p>12 A No, nobody was calling me at that time.</p> <p>13 Specifically March, no, nobody should have been</p> <p>14 calling. No.</p> <p>15 Q Okay. And then --</p> <p>16 A Nobody should have been calling me.</p> <p>17 Q -- in connection with the other lawsuit</p> <p>18 filed in March of 2021, those telephone calls were</p> <p>19 received by you before March?</p> <p>20 A Before. Yeah, yeah. That was</p> <p>21 beforehand.</p> <p>22 Q Okay.</p> <p>23 A Before that was filed. So they weren't</p> <p>24 calling during that time, no.</p>	<p style="text-align: right;">Page 89</p> <p>1 but when I'm at home on my WiFi that's never</p> <p>2 happened before.</p> <p>3 Q So I want to just get clarification on</p> <p>4 number 15. It says: Admit that you never sent a</p> <p>5 request in writing for HRRG to stop contacting you.</p> <p>6 And you denied that.</p> <p>7 Could you -- did you ever send a</p> <p>8 request in writing for HRRG to stop contacting you?</p> <p>9 A I personally did not. I don't know if</p> <p>10 Attorney Paul may have sent that on my behalf, but</p> <p>11 I did not personally mail them a letter, no.</p> <p>12 MR. CAMARENA: Krista, would you like me</p> <p>13 to elaborate on that?</p> <p>14 MS. EASOM: Sure.</p> <p>15 MR. CAMARENA: What -- I signed these.</p> <p>16 What I meant to say is that I sent an e-mail on</p> <p>17 Ms. Atkins' behalf requesting that HRRG stop</p> <p>18 contacting her.</p> <p>19 MS. EASOM: Okay. Was that at the same</p> <p>20 time you filed the complaint?</p> <p>21 MR. CAMARENA: It was probably a couple</p> <p>22 days before that, yeah.</p> <p>23 MS. EASOM: Okay. Okay. Thank you,</p> <p>24 Paul.</p>

<p style="text-align: right;">Page 90</p> <p>1 BY MS. EASOM:</p> <p>2 Q All right. I'm going to stop sharing my</p> <p>3 screen there.</p> <p>4 I'm going to go back to our</p> <p>5 interrogatories. I just want to clarify. These</p> <p>6 are your answers to HRRG's first set of</p> <p>7 interrogatories. I just want to confirm, is this</p> <p>8 your signature, your docu signature right here,</p> <p>9 Ms. Atkins?</p> <p>10 A It is.</p> <p>11 Q Okay. And do you remember signing this</p> <p>12 on December 5th, 2021?</p> <p>13 A I do.</p> <p>14 Q Okay. And before you signed it did you</p> <p>15 kind of review everything that -- all of the</p> <p>16 responses in here?</p> <p>17 A Yes, I read through it.</p> <p>18 Q Okay. Thank you.</p> <p>19 Could you just elaborate a little bit</p> <p>20 on what symptoms you had after the telephone calls</p> <p>21 from Healthcare Revenue Recovery Group?</p> <p>22 A You said what symptoms?</p> <p>23 Q Right. Just trying to get a better feel</p> <p>24 for the emotional distress, which is kind of a</p>	<p style="text-align: right;">Page 92</p> <p>1 they're on the phone all the way in Timbuktu, who</p> <p>2 knows where, so I'm like (indicating).</p> <p>3 Q Thank you.</p> <p>4 A But, yeah, it's -- I guess that's like</p> <p>5 the best explanation I can give to it.</p> <p>6 Q Did you take any medications after</p> <p>7 receiving the telephone calls or to treat, you</p> <p>8 know, what you were feeling?</p> <p>9 A No. No. I don't -- no. I don't take</p> <p>10 medication unless it's like insulin. I don't</p> <p>11 really like medication, so I try to stay away from</p> <p>12 medications. I don't -- I just deal with it, just</p> <p>13 try my best to deal with it.</p> <p>14 Q And the emotional distress, was that</p> <p>15 after the April telephone call?</p> <p>16 A Yes, that was after the April one.</p> <p>17 Q Did you feel that same stress after the</p> <p>18 March 2021 call or is it mainly after the</p> <p>19 April 2021 telephone call?</p> <p>20 A After the March one I was annoyed for</p> <p>21 sure, but I didn't feel that level of emotional</p> <p>22 distress. It was more like an annoyance of</p> <p>23 emotional distress, like, okay, here are these</p> <p>24 people, I know I don't know them so why are they</p>
<p style="text-align: right;">Page 91</p> <p>1 little bit of a vague term. Could you explain a</p> <p>2 little bit more, you know, kind of exactly what you</p> <p>3 experienced?</p> <p>4 A Yeah. So, like I was saying, I was</p> <p>5 really like -- I don't really know how to explain</p> <p>6 it. I was like really, really, really mad, like to</p> <p>7 the point of like, I don't want to say it, this is</p> <p>8 like pissing me off. I'm like, oh, my God. Like,</p> <p>9 jeez, make it stop.</p> <p>10 Like at that point I did want to like</p> <p>11 turn off my phone, but I know I can't. I'm not --</p> <p>12 I can't do that. I have a 12-year-old. Like I</p> <p>13 have to have my phone like all the time. He plays</p> <p>14 sports and all this other stuff, so I'm like I</p> <p>15 don't even know what to do, I'm between a rock and</p> <p>16 a hard place right now because these people are</p> <p>17 still going to keep calling me, and like I was just</p> <p>18 upset. I was really, really, really upset.</p> <p>19 It's kind a little bit hard to</p> <p>20 explain, but it was like -- like, you know, like</p> <p>21 when you shake if you're like really upset and then</p> <p>22 you feel like there's nothing you can really do but</p> <p>23 it's like I just want to punch somebody but I</p> <p>24 couldn't because nobody is there to punch, so</p>	<p style="text-align: right;">Page 93</p> <p>1 still calling me. Like it was kind of like</p> <p>2 annoying, but I wasn't like ready to fight them. I</p> <p>3 was just like annoyed more than anything.</p> <p>4 Like every time I noticed the calls</p> <p>5 I'm like, oh, HRRG. Then they would leave like</p> <p>6 these automated messages like, "This is HRRG." So</p> <p>7 I'm like, oh, gosh. Like I have to clear --</p> <p>8 literally before all this started happening I have</p> <p>9 to clear out, because I don't really check my voice</p> <p>10 mails, I have to clear out my voice mails because</p> <p>11 it's all of them with that.</p> <p>12 So I'm like it would give me like a</p> <p>13 notification like your mailbox is full, you have to</p> <p>14 clear it out, and mainly probably, no lie, like 60</p> <p>15 percent of my mailbox was HRRG. Like I do not have</p> <p>16 to clear my mailbox out that often because people</p> <p>17 in 2021 do not even like leave messages, my friends</p> <p>18 and stuff. 60 percent of my mailbox should not be</p> <p>19 HRRG calling here. Like seriously. So I was more</p> <p>20 annoyed at all of that.</p> <p>21 The April really like took me over the</p> <p>22 top past annoyance. It was like if I could really</p> <p>23 get my hand on you right now, but I couldn't. So</p> <p>24 just moved on.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q Did you have anything else kind of going 2 on in March 2021 or April 2021 that was stressful 3 in your life?</p> <p>4 A No, not really. I mean, we're in the 5 middle of a national pandemic, if that counts. 6 But, no, that wasn't stressful for me. I was fine.</p> <p>7 Q In March and April of 2021 what was your 8 normal sort of routine day to day, if you can kind 9 of walk us through your normal day?</p> <p>10 A March and April 2021 a normal day? I 11 don't know. Like I said, we're in the middle of a 12 pandemic right now, so I wasn't at work. I would 13 probably, you know, get up. My son had virtual 14 school, deal with that, deal with some virtual 15 school stuff, do some like stock research. I think 16 I was like trying to learn stocks or something at 17 that time. I didn't have too much going on.</p> <p>18 Back then, you know, my mom, probably 19 chitchat with her a little bit. I don't really 20 know. Actually, March 2021 -- yeah, it was weird 21 times right now. Like my schedule way off by 22 March of 2021 just 'cause, you know, things have 23 changed in the world.</p> <p>24 Q Okay. Were you stressed out at all about</p>	<p style="text-align: right;">Page 96</p> <p>1 A It's possible. If I can get my mom to 2 move to Texas, like I really don't want to leave my 3 mom here because my sister and brother are in 4 Texas, so it's like I have my mom. Like I don't 5 want to leave her here in Chicago.</p> <p>6 You know, if she agrees, which right 7 now she's kind of like not agreeing, so if she 8 agrees like that she can come to Texas then I will 9 move to Texas. Yeah. The weather and stuff is 10 better for her, but she doesn't -- she doesn't want 11 to really. She's older, so you know how older 12 people, they're like not comfortable making those 13 type of moves.</p> <p>14 So I'm like, "Oh, just come to Texas," 15 and she's like, "Well, I don't want to."</p> <p>16 So I'm like here with her. But, I 17 mean, it's fine, but I would rather like be in 18 Texas permanently instead of like back and forth, 19 which right now it's easier because I fly for free 20 still, it was a part of my deal with Southwest, so 21 it's easy to get, you know, back and forth but 22 eventually that's going to end and then flights are 23 going to be expensive. So...</p> <p>24 Q Do you plan to travel back to Illinois</p>
<p style="text-align: right;">Page 95</p> <p>1 the pending action that you had against FlexShopper 2 at all?</p> <p>3 A No. I wasn't worried about that at all.</p> <p>4 Not at that time. That was over.</p> <p>5 Q Besides Healthcare Revenue Recovery Group 6 and FlexShopper, are there any other companies that 7 you can think of that called you in the beginning 8 of 2021 to discuss an outstanding debt?</p> <p>9 A In the beginning of 2021? No. No.</p> <p>10 Nobody was calling me in the beginning of 2021.</p> <p>11 Q And around what time did you start trying 12 to make the transition to move to Texas?</p> <p>13 A August. July, August.</p> <p>14 Q Of this year?</p> <p>15 A Yeah, yeah, this year. This is new.</p> <p>16 Like Texas is a new -- like I said, my brother, he 17 lives here, and so I'm like back and forth and 18 everything. My sister, she lives here now. So she 19 lives here in Texas, there at Texas.</p> <p>20 But I'm like back and forth, you know.</p> <p>21 But I started that transition, I tried to do it 22 this summer to try to like lock it in by next 23 summer, like my own personal home for next summer.</p> <p>24 Q Do you plan to move to Texas permanently?</p>	<p style="text-align: right;">Page 97</p> <p>1 for the trial in this case?</p> <p>2 A Well, I'm in Illinois right now. I don't 3 know when the trial is going to be, but, yeah, if I 4 have to come there then I will be -- if I'm in 5 Texas and I have to come back then, I mean, I just 6 got to do what I got to do.</p> <p>7 MR. CAMARENA: Excuse me. Krista?</p> <p>8 MS. EASOM: Yes.</p> <p>9 MR. CAMARENA: Ms. Atkins earlier had 10 advised me she has a 12:45 doctor's appointment, so 11 I'm wondering whether we should take a lunch break 12 sometime soon if you just have a little bit more.</p> <p>13 BY MS. EASOM:</p> <p>14 Q So you need to be out of here by 12:45, 15 Ms. Atkins?</p> <p>16 A Oh, no. I actually should be like going 17 right now. I have to go to the University of 18 Chicago to my endocrinologist appointment with 19 Dr. Zey, so that's at 12:45.</p> <p>20 He said that it would be like two 21 hours, so I was like, okay, fine, if I leave at 22 like noon then I should be able to -- you know, 23 it's right over -- are you in Chicago? I don't 24 know. It's right over on Maryland. You probably</p>

<p style="text-align: right;">Page 98</p> <p>1 know where University of Chicago is. So I have to 2 be over there at 12:45.</p> <p>3 Q Okay. So you need to leave for your 4 appointment now?</p> <p>5 A If we're about to wrap up, are we close 6 to being like done or no?</p> <p>7 Q I mean, we can take a break, I can kind 8 of go over my notes while you are going to your 9 appointment, and I can let Paul know if we need to 10 pop back in to finish anything up.</p> <p>11 MS. EASOM: June, do you have another 12 deposition this afternoon?</p> <p>13 THE REPORTER: No, I don't.</p> <p>14 MS. EASOM: Would you be available if we 15 need to reconvene at like 2:00 p.m. Central?</p> <p>16 THE REPORTER: Sure. You'd have to let 17 Veritext know.</p> <p>18 MS. EASOM: I'll e-mail Veritext, and 19 I'll include you on the e-mail as well.</p> <p>20 BY MS. EASOM:</p> <p>21 Q You know, Ms. Atkins, I don't want you to 22 be late for your appointment, so we can call this a 23 lunch break --</p> <p>24 A Yeah, like previously I haven't done like</p>	<p style="text-align: right;">Page 100</p> <p>1 Q Okay. So you never contacted Transunion 2 or Experian or Equifax to dispute the debt from 3 Little Company of Mary or HRRG?</p> <p>4 A No.</p> <p>5 Q Okay. Did you ever contact a credit 6 reporting bureau to dispute another debt that was 7 on your credit report?</p> <p>8 A It's possible. I have spoken with some 9 credit repair specialists before, so I personally 10 have not disputed anything on my report, no. I 11 haven't disputed anything with HRRG or Little 12 Company of Mary.</p> <p>13 Q Okay. And I'm going to try to make this 14 quick because I know you have your appointment.</p> <p>15 Were you working in March of 2021 and April of 2021?</p> <p>16 A I was not working at Southwest, no.</p> <p>17 Q So what was your main occupation during 18 that time?</p> <p>19 A My main occupation at that time I was 20 really just doing like insurance stuff and that 21 sort of thing. I wasn't like clocking a 9:00 to 22 5:00. I was doing insurance appointments, 23 insurance writing, insurance classes, insurance 24 everything at that point.</p>
<p style="text-align: right;">Page 99</p> <p>1 this Zoom deposition or anything before, so I 2 figured two hours was more than enough time when I 3 agreed to the, you know, 10:00 o'clock or I would 4 have tried to reschedule it at that time. So my 5 apologies for that. I didn't know these things ran 6 this long, a few questions here and there, but 7 apparently more to it.</p> <p>8 Q So just so I can completely, you know, 9 narrow in on exactly what your damages are, we're 10 limiting -- the damages are limited to emotional 11 distress; is that correct?</p> <p>12 A That's correct.</p> <p>13 Q Okay. And are there any financial 14 damages that you experienced as a result of the 15 telephone call?</p> <p>16 A No, not besides, you know, having to 17 obtain a lawyer to try to get this stuff stopped 18 and all that, no. Not like any extra damages like 19 that.</p> <p>20 Q And did you ever dispute the debt to any 21 credit reporting agency?</p> <p>22 A For HRRG? Or Little Company of Mary?</p> <p>23 Q Yes.</p> <p>24 A No, no.</p>	<p style="text-align: right;">Page 101</p> <p>1 Q And when did you purchase the other 2 property that you own in Illinois? I believe it's 3 Marshall Street; is that right?</p> <p>4 A Marshfield. Yeah, that was 2019.</p> <p>5 Q In 2019 you purchased was it a 6 condominium?</p> <p>7 A No, it's a home. It's a single-family 8 unit.</p> <p>9 Q And are you current on your mortgage 10 payments?</p> <p>11 A With them?</p> <p>12 Q Yes.</p> <p>13 A Yeah and no. They kind of deferred it 14 because of COVID and everything, so I don't know if 15 you want to call it current but I guess.</p> <p>16 MR. CAMARENA: We'll supplement that 17 we're not seeking economic damages, if that's what 18 you need, and we'll stipulate that we're not bringing 19 any action with respect to the FCRA or the failure 20 to report a dispute because that's not what happened.</p> <p>21 BY MS. EASOM:</p> <p>22 Q Okay. Have you -- is there anyone you 23 have not identified who you can think of who may 24 have knowledge about anything related to this</p>

<p style="text-align: right;">Page 102</p> <p>1 lawsuit?</p> <p>2 A No. No, just me and Attorney Paul, you</p> <p>3 guys.</p> <p>4 Q Okay.</p> <p>5 A I haven't discussed this.</p> <p>6 MS. EASOM: Okay. So we can hit the</p> <p>7 pause button. I'm concluding subject to reserving</p> <p>8 our right to reconvene. To the extent that we have</p> <p>9 any more material that we need to go through and in</p> <p>10 the event additional documents are produced, we</p> <p>11 would reserve our right to come back another day,</p> <p>12 another time, to discuss any additional documents</p> <p>13 that are produced that are in your custody, control</p> <p>14 that were requested.</p> <p>15 I'm going to -- Paul, we can go off</p> <p>16 the record now.</p> <p>17 (Whereupon a discussion was</p> <p>18 held outside the record.)</p> <p>19 MS. EASOM: We can conclude the record</p> <p>20 here. We can indicate we're taking a lunch break,</p> <p>21 and I will let you know if we need to reconvene</p> <p>22 this afternoon. I'm just going to check with Paul</p> <p>23 because there are a few items that we didn't</p> <p>24 necessarily go over but we may be able to get by</p>	<p style="text-align: right;">Page 104</p> <p>1 STATE OF ILLINOIS )</p> <p> ) SS.</p> <p>2 COUNTY OF KANE )</p> <p>3 The within and foregoing videoconference</p> <p>4 deposition of the aforementioned witness was</p> <p>5 reported remotely JUNE M. FUNKHOUSER, CSR, RMR and</p> <p>6 Notary Public, on the date and time aforementioned.</p> <p>7 There were present via videoconference</p> <p>8 during the taking of the deposition the previously</p> <p>9 named counsel.</p> <p>10 The said witness was first duly sworn via</p> <p>11 videoconference and was then examined upon oral</p> <p>12 interrogatories; the questions and answers were</p> <p>13 taken down in shorthand by the undersigned, acting</p> <p>14 as stenographer and Notary Public; and the within</p> <p>15 and foregoing is a true, accurate and complete</p> <p>16 record of all of the questions asked of and answers</p> <p>17 made by the aforementioned witness, on the date and</p> <p>18 time hereinabove referred to.</p> <p>19 Before completion of the deposition,</p> <p>20 review of the transcript { } was {X} was not</p> <p>21 requested. If requested, any changes made by the</p> <p>22 deponent (and provided to the reporter) during the</p> <p>23 period allowed are appended hereto.</p> <p>24 The undersigned is not interested in the</p>
<p style="text-align: right;">Page 103</p> <p>1 with what we covered today.</p> <p>2 So, Paul, do you want me to just give</p> <p>3 you a call back in a few?</p> <p>4 MR. CAMARENA: We can talk here if you</p> <p>5 want or if you have to go through your records you</p> <p>6 can call me back. I'll be available the rest of</p> <p>7 the afternoon.</p> <p>8 MS. EASOM: Okay; great. I'll give you a</p> <p>9 ring. I'll go through everything, and I'll give</p> <p>10 you a call back.</p> <p>11 MR. CAMARENA: Okay. Thanks.</p> <p>12 THE REPORTER: Did you want to put</p> <p>13 transcript orders on the record, if there are any</p> <p>14 orders?</p> <p>15 MS. EASOM: I'm 99 percent certain we're</p> <p>16 going to order the transcript, but I just need to</p> <p>17 double-check with the client and so I'll get back</p> <p>18 to you on that.</p> <p>19 MR. CAMARENA: So I'll just wait for a</p> <p>20 phone call.</p> <p>21 MS. EASOM: All right. Thank you, Paul.</p> <p>22 MR. CAMARENA: Thanks, Krista.</p> <p>23 (Whereupon the deposition was</p> <p>24 suspended at 12:09 p.m.)</p>	<p style="text-align: right;">Page 105</p> <p>1 within case, nor of kin or counsel to any of the</p> <p>2 parties.</p> <p>3 Witness my official signature and seal as</p> <p>4 Notary Public in and for Kane County, Illinois, on</p> <p>5 the 17th day of January, A.D. 2022.</p> <p>6</p> <p>7 </p> <p>8 JUNE M. FUNKHOUSER, CSR, RMR</p> <p>9 Notary Public</p> <p>10 License No. 084-003024</p> <p>11 One North Franklin Street, Suite 3000</p> <p>12 Chicago, Illinois 60606</p> <p>13 Phone: (312) 442-9087</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

[&amp; - accused]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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